

IN THE UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF THE DISTRICT OF COLUMBIA

_____	)	
UNITED STATES,	)	
	)	
v.	)	Crim. No. 21cr40
	)	Hon. Trevor McFadden
ROBERT MORSS,	)	
Defendant.	)	
_____	)	

MOTION TO SUBSTITUTE COUNSEL

Comes now Defendant Robert Morss, by counsel, and moves this Court to substitute his appointed counsel, AFDK Kathleen Gaughan and AFDK Elizabeth Toplin, with retained counsel, John C. Kiyonaga, undersigned.<sup>1</sup>

Respectfully Submitted,

ROBERT MORSS  
By Counsel

/s/  
John C. Kiyonaga

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Alexandria, Virginia 22314  
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Counsel for the Defendant

Certificate of Electronic Service

I hereby certify that on September 29, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF System, with consequent service on all parties.

/s/  
John C. Kiyonaga

<sup>1</sup> Undersigned notes that he already represents co-defendant Geoffrey Sills. Since Messrs. Sills and Morss do not know each other and neither is charged with Conspiracy, their representation by the same lawyer appears to create no conflict of interest. Both have executed a conflict waiver.

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ROBERT MORSS,	)	
Defendant.	)	
_____	)	

ORDER

Upon motion of Defendant Robert Morss and for good cause shown, it is hereby

ORDERED that counsel appointed to represent Defendant, AFDK Kathleen Gaughan and AFDK Elizabeth Toplin, be and hereby are substituted as counsel for Defendant by retained counsel, John C. Kiyonaga. Attorneys Gaughan and Toplin are hereby relieved of further responsibility for the defense of Defendant.

Date: \_\_\_\_\_

\_\_\_\_\_  
HON. TREVOR N. McFADDEN  
UNITED STATES DISTRICT JUDGE