

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

UNITED STATES OF AMERICA,)
)
 v.)
)
 CHRISTOPHER WORRELL)
)
 Defendant.)
 _____)

Case No. 1:21-CR-292 -RCL-1

MOTION TO WITHDRAW

COMES NOW Joseph W. Allen, co-counsel for the above-named Defendant, and respectfully prays this Court grant his motion to withdraw as counsel of record for Christopher Worrell and in support thereof states as follows:

1. Since the time set by this Court for trial (ECF 202), Counsel has, both personally and through his office, made no less than four attempts to communicate with Defendant.
2. Defendant refuses to respond which is a continuation of refusing to communicate that has been ongoing for some months.
3. Further, Counsel has been kept in the dark by both the Defendant and co-counsel as to any preparations for trial as well as remaining uninformed and unapprised of any actions taken on Defendant’s behalf by co-counsel, such as the filing of motions or communication had with the ASUA in this case.
4. Defendant, in so doing, has made it impossible for Counsel to prepare for trial and places Counsel in a position of malpractice.

5. Per this Court's Order of January 11, 2023 (ECF 202) it was observed by the Court that Mr. Shipley is available for trial in this matter and therefore no delay will result in granting Counsel's motion.
6. Further, Defendant has failed to fulfill his contractual obligation in regard to the trial retainer.
7. As Defendant will not communicate with Counsel so as to aid him in preparing for trial, has failed to fulfill his contractual obligation, and it appears that Counsel is of no service to the Defendant or his co-counsel in this case, no party will be prejudiced by granting withdrawal in this matter.

WHEREFORE Counsel respectfully prays this Court grant him leave to withdraw as Counsel of record; find that no party will be prejudiced thereby and no delay of trial in this matter will occur in so granting; and for such other and further relief as this Court shall deem just and proper on the premise.

Respectfully submitted,

A handwritten signature in black ink that reads "Gall". The signature is written in a cursive, flowing style.

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CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of January 2023, I filed the foregoing Motion to Withdraw and accompanying Order by the Court's CM/ECF system. All case registered parties will be served by CM/ECF.

A handwritten signature in black ink that reads "Gallen". The signature is written in a cursive style with a large initial "G" and a long tail on the "l".

Joseph W. Allen