

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

<b>UNITED STATES OF AMERICA,</b>	:	
	:	
v.	:	<b>No. 1:21cr-00026-CRC</b>
	:	
<b>CHRISTOPHER ALBERTS,</b>	:	
<b>Defendant.</b>	:	

**MOTION OF ALLEN H. ORENBURG  
FOR LEAVE TO WITHDRAW AS COUNSEL**

COMES NOW Attorney Allen H. Orenberg, of The Orenberg Law Firm, P.C., counsel for defendant, Christopher Alberts, hereby respectfully requests the entry of an Order granting leave to withdraw as counsel (and to vacate the CJA Appointment) in this matter.

As grounds, the following is stated:

1. Undersigned counsel was appointed (CJA) by the Court on September 8, 2021. On February 8, 2022, the Court granted the Pro Hanc Vice motion as to Kenneth W. Ferguson, Esquire. On February 10, 2022, counsel filed a motion for leave to withdraw as counsel. (In light of Mr. Ferguson entering his appearance) On February 16, 2022, the Court denied counsel's motion for leave to withdraw, without prejudice. (It was my understanding that Mr. Ferguson was "lead" counsel and that I was to assist Mr. Ferguson as "stand-by" counsel) On June 24, 2022, the Court granted Mr. Ferguson's motion for leave to withdraw as counsel.

2. On August 4, 2022, Mr. Alberts informed counsel that he was going to request the Court to appoint new counsel. It is further believed that provided the opportunity to do so before this Court, Mr. Alberts will knowingly and voluntarily assent to the termination of the undersigned's representation.

3. Because of the severe length of prison time which Mr. Alberts is facing, the Court should not compel him to proceed in this matter with an attorney whom he no longer shares the essential elements of a viable and healthy attorney-client relationship. Undersigned counsel and Mr. Alberts no longer enjoy a genuine attorney-client relationship; the crucial elements of trust and confidence by and between this lawyer and defendant have been eroded beyond the point where the relationship may be satisfactorily restored. Furthermore, the interests of justice will be served by the entry of an Order granting this Motion allowing counsel to withdraw his appearance on behalf of Mr. Alberts.

4. A trial date has not yet been scheduled. Counsel submits that granting leave to withdraw as counsel will not prejudice the parties or the Court, and/or otherwise will be in the interests of justice.

WHEREFORE, for the foregoing reasons and such other reasons that may appear just and proper, Attorney Allen H. Orenberg respectfully requests the entry of an Order granting leave to withdraw as counsel (and to vacate the CJA appointment) in case no 21-26-CRC.

Respectfully Submitted,

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Allen H. Orenberg, # 395519  
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Dated: August 5, 2022

**CERTIFICATE OF SERVICE**

I hereby certify that on the 5<sup>th</sup> day of August, 2022, I served the foregoing Motion for Leave to Withdraw as Counsel by CM/ECF to all case registered parties and by e-mail & postage pre-paid first class mail to Christopher Alberts.

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Allen H. Orenberg