

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

THE UNITED STATES OF AMERICA §
§
vs. § **CAUSE NO.: 1:21-CR-367**
§
JALISE MIDDLETON §

MOTION TO WITHDRAW

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, PHILLIP A. LINDER and JAMES WHALEN, Attorneys of Record for Jalise Middleton and respectfully request leave of the Court to withdraw as counsel for Defendant, and in support would respectfully show thereof:

I.

Attorneys, PHILLIP A. LINDER and JAMES WHALEN, were hired to represent Jalise Middleton in her criminal case in Federal District Court in May 2021. Defendant has breached the contractual agreement for fees for services rendered by Defendant's counsel in connection with this case and has become indigent. Neither she nor her husband, who is also a co-defendant, have been able to pay fees since February 2022. See attached financial affidavit.

II.

Counsel has notified the Defendant of their intent to withdraw via in-person conversation and via email. The Defendant stated she understood the reason for the withdrawal and would like the court to appoint her a lawyer as soon as possible.

WHEREFORE, PREMISES CONSIDERED, Defendant's counsel prays that this Honorable Court allow their withdrawal, and that present counsel be released from further obligation or duty to the Defendant as Attorney of Record and that this court appoint the Public Defender's Office to represent her going forward.

RESPECTFULLY SUBMITTED,

s// Phillip A. Linder
PHILLIP A. LINDER
ATTORNEY FOR DEFENDANT

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CERTIFICATE OF CONFERENCE

I, Phillip Linder, hereby certify that on September 11, 2022, I conferred with AUSA Brian Kelly and James Lee Bright, Counsel on the above-referenced Motion to Withdraw and they indicated they had no objection to the granting of this Joint Motion to Withdraw.

CERTIFICATE OF SERVICE

On this 12th day of September 2022, a true and correct copy of the foregoing Motion to Withdraw was delivered to Brian Kelly, Assistant United States Attorney, via ECF.

s// Phillip A. Linder
PHILLIP A. LINDER