

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

DANIEL GOODWYN

Defendant.

Case No. 21-cr-153 (RBW)

MOTION FOR LEAVE TO FILE UNDER SEAL
EXHIBIT A TO MOTION TO WITHDRAW AS COUNSEL

Undersigned counsel respectfully moves this Court for the entry of an Order granting Defendant the right to file under seal Exhibit A in accordance with the procedures outlined in Local Rule 5.4

Dated: New York, NY
April 20, 2022

Respectfully submitted,

/s/ Joseph D. McBride, Esq.

Bar ID: NY0403

THE MCBRIDE LAW FIRM, PLLC

99 Park Avenue, 6th Floor

New York, NY 10016

p: (917) 757-9537

e: jmcbride@mcbridelawnyc.com

Counsel for the Defendant