

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Criminal Case No.
	:	
RICHARD BARNETT,	:	1:21-cr-0038 (CRC)
	:	
Defendant	:	
	:	

MOTION TO WITHDRAW

Bradford L. Geyer, an attorney of record for Richard Barnett, the defendant in the abovecaptioned case, hereby respectfully moves this Honorable Court for an order allowing him to withdraw as an attorney of record, and submits the following in support:

This is a permissive request and does not involve any mandatory issues surrounding withdrawal of counsel. Undersigned counsel appeared in the case upon request to support Mr. Barnett's trial preparation and trial and has at least two other cases going to trial, one of which is scheduled to begin on March 25, 2022 and another that should be proceeding to trial in the next two to three months.

Undersigned counsel's prior two trial assignments involved defendant entries from the East whereas these new cases involve entry into the West side of the building requiring a great deal of foundational work. Because of an inability to find counsel that could represent a prior client in a January 6 civil matter brought by the District and also in the prior client's appeal, I have taken those matters on pro bono after working the two month trial last year for that client for very little compensation that did not even cover costs.

Mr. Barnett's case now involves sentencing. Mr. Barnett concurs with this request given

that his review of the Presentencing Investigative Report, any objections to that report or to the government's sentencing memorandum, and the writing of his sentencing memorandum will be accomplished by Mr. Jonathan Gross with whom undersigned counsel remains in close contact.

Undersigned counsel remains supportive of Mr. Barnett as a person and defendant, and he knows he can call upon for a second legal opinion or to review his legal options. Undersigned counsel respectfully submits that Mr. Barnett will not be prejudiced by this request.

Undersigned Counsel has fully discussed this with Mr. Barnett the processes and matters remaining for his case. He agrees that his sentencing, and any possible notice of appeal, may proceed with Mr. Gross or new attorneys as he may choose to retain.

WHEREFORE, in consideration of the foregoing reasons, and for such other reasons that may appear just and proper, I request that this court issue an order permitting undersigned counsel to withdraw as an attorney of record and, by doing so, relieve him of any further obligation to this case.

It was an honor and privilege to appear before this Court and it was a professionally enriching and rewarding experience.

Dated: March 13, 2023

RESPECTFULLY SUBMITTED, By Counsel

/s/ Brad Geyer

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CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2023, a true and accurate copy of the forgoing was electronically filed and served through the ECF system of the U.S. District Court for the District of Columbia.

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