

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

vs.

RYAN ZINK

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CASE NO. 1:21-cr-00191-JEB-1

STATUS REPORT

TO THE HONORABLE JAMES E. BOASBERG, UNITED STATES DISTRICT
JUDGE FOR THE DISTRICT OF COLUMBIA:

NOW COMES DEFENDANT RYAN ZINK'S undersigned counsel in the above-
styled and numbered cause, and file this status report.

Counsel for Defendant regret to inform this Honorable Court that after
considerable discussion and consideration, counsel anticipate filing a Motion to
Withdraw¹ as counsel for Defendant Zink in this case. Counsel have advised
Defendant of their position.

Counsel wanted to put the Court on notice of same, and because the reasons
for filing this Motion to Withdraw as Counsel are attorney-client privileged matters,
Counsel is seeking the Court's advice as to how the Court wishes that Counsel proceed
with regard to filing this motion.

In the event that Defendant Zink prefers not to waive privilege and wishes to
assert his attorney-client privilege as to these confidential matters, undersigned

¹ Counsel will, of course, convey their work product to new counsel and assist new
counsel in taking on the representation.

Counsel would suggest that this Honorable Court may prefer that said Motion to Withdraw be filed with a Magistrate Judge in order that the reasons for undersigned Counsel's decision not be heard before the tribunal trying Defendant's case, or in the alternative Counsel could file said reasons as a sealed exhibit with this Court, in the event that some further review becomes necessary. Counsel has advised Government Counsel, AUSA Francesco Valentini that undersigned anticipated filing such a Motion to Withdraw, however, have not disclosed the reasons for said motion.

Counsel will be prepared to deal with this matter at the upcoming Status Conference scheduled for January 3, 2023, or at any other time that this Honorable Court deems appropriate.

Respectfully submitted,

GOLDSTEIN & ORR

By: /s/ Cynthia E. Orr
Cynthia E. Orr

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Attorney for defendant,
RYAN ZINK

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been electronically delivered to Assistant United States Attorney Francesco Valentini, as a registered participant to the CM/ECF document filing system, on this the 29th day of December 2022.

/s/ Cynthia E. Orr
Cynthia E. Orr