

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

UNITED STATES OF AMERICA

v.

JEREMY BROWN,

Defendant.

No. 1-21-cr-609-APM

Hon. Judge Amit P. Mehta

**MOTION TO WITHDRAW AS COUNSEL OF RECORD**

COMES NOW the undersigned attorneys and hereby moves this Honorable Court to allow the undersigned to withdraw as counsel of record pursuant to LCR 44.5(4)(d). In support thereof states as follows:

1. The undersigned were retained as counsel by Mr. Brown on October 10, 2022. (Dkt. 25, 26)
2. The case was stayed pending resolution of Mr. Brown's criminal charges in the Middle District of Florida. Those charges were resolved with Mr. Brown being sentenced to seven years on April 7, 2023.
3. The undersigned and Mr. Brown have met in person and via video on multiple occasions to discuss his case.
4. The undersigned and Mr. Brown now have conflicts that cannot be resolved, and the undersigned have an ethical obligation to withdraw from his case.
5. The undersigned discussed their intention to withdraw with Mr. Brown today. He acknowledged and understood the conflicts and will be retaining an attorney from central Florida.
6. If the Court has a hearing on the instant motion we would request that it be conducted remotely by video to avoid Mr. Brown's transfer to the District of Columbia. This would allow Mr. Brown to retain new counsel in Florida and meet and confer about his case.

Wherefore, the undersigned lawyers request to withdraw from representing the Defendant.

Dated: May 1, 2023

Orlando, Florida

Respectfully submitted,

By:	<u>/s/ Dan Eckhart</u> DAN ECKHART, Esq. FL Bar No. 488674 200 E. Robinson St., Ste. 1150 Orlando, FL. 32801 <a href="mailto:dan@daneckhartlaw.com">dan@daneckhartlaw.com</a> (407) 276-0500	<u>/s/ David Bigney</u> DAVID BIGNEY, Esq. FL Bar No: 132454 215 East Livingston Street Orlando, Florida, 32801 <a href="mailto:dbigney@bigneylaw.com">dbigney@bigneylaw.com</a> (407) 425-6068
-----	--	---

CERTIFICATE OF SERVICE

I hereby certify that on May 1, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all parties listed on the Electronic Case Filing (ECF) System.

By: /s/ Dan Eckhart  
DAN ECKHART

/s/ David Bigney  
DAVID BIGNEY