

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States of America)	
)	
v.)	USDC No. 22-cr-32 (FYP)
)	
Blas Santillan.,)	<i>defendant.</i>

MOTION TO WITHDRAW AS COUNSEL, APPOINT
NEW COUNSEL, AND VACATE DEADLINE FOR FILING OF
DEFENDANT’S SENTENCING MEMO

Undersigned counsel Nathan I. Silver, II, Esq., (“counsel”) appointed by this Court to represent the defendant under the Criminal Justice Act, respectfully moves the Court to permit counsel to withdraw as the defendant's attorney of record, appoint new counsel and vacate the deadline for the submission of the defendant's sentencing memorandum. The reasons follow.

1. Counsel consulted with the defendant yesterday, August 8, 2022, regarding the preparation of his sentencing memorandum. Counsel reviewed with the defendant materials pertinent to the preparation of the memorandum and what to expect during the sentencing hearing itself.

2. As a result of that consultation, it became apparent that a conflict existed in counsel’s continuing to remain as counsel of record in this case. In counsel’s view, the conflict itself cannot be resolved and an irreparable breach has occurred in the attorney-client relationship. The defendant himself could be disserved were counsel to remain as his attorney.

3. It is not anticipated that the defendant is inclined to withdraw his plea of guilty and it is possible, even likely, that the defendant could maintain his plea and go to sentencing with new counsel.

4. Counsel has notified the government generally of his intention to move the Court to permit counsel's withdrawal, appoint new counsel, and vacate the deadline for the submission of defendant's sentencing memorandum until the Court rules on the instant Motion.

5. In the circumstances, the Court may wish to convene a status hearing specially before the sentencing date of August 26, 2022, so it can rule on these matters.

6. For the reason stated, counsel moves to withdraw as attorney of record; to have the Court new counsel under the Criminal Justice Act for defendant, who remains eligible for appointed counsel, and to vacate the deadline for the filing of the defendant's sentencing memorandum

A proposed Order is attached.

WHEREFORE, the defendant respectfully moves the Court to grant said relief.

This pleading is,

Respectfully submitted,

/s/

NATHAN I. SILVER, II
Unified Bar #944314
6300 Orchid Drive
Bethesda, MD 20817
(301) 229-0189 (direct)
(301) 229-3625 (fax)
email: nisquire@aol.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing pleading has been served via ECF on Christopher D. Amore, Esq., United States Department of Justice, Capitol Riot Detailee, attorney of record for the government in the instant case, this 9th day of August, 2022.

/s/

Nathan I. Silver, II

cc: Blas Santillan (to personal email)