

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

UNITED STATES OF AMERICA,

Case No. 1:21-CR-00722 (TFH)

v.

MARYANN MOONEY-RONDON,

Defendant.

MOTION TO WITHDRAW AS COUNSEL

Karl Sleight, Esq. an attorney admitted to practice before the District Court of the District of Columbia affirms the following statements and respectfully moves this Court to grant this motion to withdraw as counsel for Maryann Mooney Rondon the defendant in these proceedings (hereinafter “Ms. Rondon” or the “Defendant”).

I am the counsel for record for Defendant and initially appeared as counsel for the Defendant in this Court on or about December 10, 2021, where she was facing allegations of certain federal laws related to the January 6, 2021 incident at the United States Capitol as set forth in a grand jury indictment (Docket 19).

Since the indictment, the Government has provided a series of discovery disclosures and materials in this matter, the latest of which was received on July 17, 2022 from AUSA Will Widman, Esq. and identified as “Global Discovery Volume 17”.

These proceedings have been the subject of a number of stipulations by the Government and the Defendant, and approved by the Court, to adjourn the proceedings in the interest of justice.

During this period, on June 8, 2022, counsel for the Defendant notified the firm of Harris Beach, PLLC (the “Firm”) that he was withdrawing as a member of the Firm.

Since tendering my notice of withdrawal to the Firm, I have raised the issue of the Defendant's need for new counsel with the Firm's management and with other attorneys at the Firm. Thereafter, the Firm advised that with my departure they do not have necessary competency or desire to continue with the representation of the Defendant in this matter going forward.

Subsequently, I took steps to have the Defendant complete and submit the standard Financial Affidavit to determine whether Defendant was eligible for assigned counsel through the Federal Defender.

On Wednesday July 20, 2022, pursuant to the Firm's Operating Agreement, the Firm's Management Committee advised me that July 29, 2022 would be my last day of employment at the Firm.

On Friday July 22, 2022, a hearing was held before the Honorable G. Michael Harvey, Magistrate for the United States District Court for the District of Columbia to ascertain whether the Defendant would be eligible for assigned counsel through the Federal Defender.

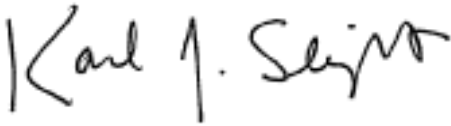
Judge Harvey determined that the Defendant was eligible for assigned counsel. The Federal Defender has tentatively designated Peter Cooper, Esq. as substitute counsel to take over this case in the event that this motion to withdraw is granted by the Court.

Given the circumstances and the fact that the case has not yet been the subject of motion practice and is seemingly still in its discovery phase, counsel believes that the Defendant would not be disadvantaged by a change in counsel at this juncture of the proceedings. Moreover, counsel does not believe that there would be any negative impact to the administration of justice in this matter by this change in counsel.

In the event that the Court grants this motion to withdraw as counsel, and appoints Mr. Cooper, counsel will work with Mr. Cooper to ensure a smooth transition of the file in this matter.

Respectfully submitted,

HARRIS BEACH PLLC



Karl J. Sleight
Bar Enrollment # 601976
677 Broadway, Suite 1101
Albany, NY 12207
Phone: 518 701.2716 (direct)
Email: ksleight@harrisbeach.com

DATED: July 25, 2022

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing pleading has been served via ECF on AUSA Will Widman, Esq. of the United States Attorney's Office for the District of Columbia, attorney of record for the United States, this 25th day of July, 2022.

Karl J. Sleight, Esq.