## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, :

:

v. : Case No. 22-cr-00149-JEB

:

ATHANASIOS ZOYGANELES,

:

Defendant. :

## MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

COMES NOW Attorney Allen H. Orenberg, counsel for the defendant,
Athanasios Zoyganeles, to respectfully move this Honorable Court for the entry of
an Order granting leave to withdraw as counsel in 22-cr-00149-JEB. As grounds,
the following is stated by undersigned counsel:

- There now exists between defendant and counsel a fundamental disagreement as to how to proceed in this matter. Counsel submits this disagreement is now irreconcilable and cannot be satisfactorily repaired.
  - 2. A sentencing hearing is scheduled for January 26, 2023, at 11:00 a.m.
- 3. The Defendant should not be compelled to proceed to sentencing with an attorney with whom he does not have full faith and confidence.
- 4. Counsel submits that granting this motion will not prejudice the parties or the Court, and/or otherwise will be in the interests of justice.
- 5. On January 24, 2023, a copy of this instant Motion has been mailed postage pre-paid first class mail and sent by e-mail to the defendant, along with a letter advising him that if he wants to respond to this Motion For Leave To

Withdraw As Counsel, he should promptly file his written response with the Clerk

of Court.

WHEREFORE, foregoing reasons, and for such other reasons that may

appear just and proper, undersigned counsel respectfully requests moves this

Honorable Court for the entry of an Order granting leave to withdraw as counsel for

the defendant in case no. 22-cr-00149-JEB.

Respectfully Submitted,

Allen H. Orenberg, # 395519

The Orenberg Law Firm, P.C. 12505 Park Potomac Avenue, 6<sup>th</sup> Floor

Potomac, Maryland 20854

Tel. No. 301-984-8005

Cell Phone No. 301-807-3847

Fax No. 301-984-8008

aorenberg@orenberglaw.com

Dated: January 24, 2023

2