

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	CRIMINAL NO. 1-22-cr-38 (CKK)
	:	
JOLENE EICHER	:	
	:	
_____	:	

MOTION TO REPLACE COUNSEL

Jolene Eicher, through undersigned counsel moves this Honorable Court to allow counsel to withdraw and to appoint new counsel. In support of this motion, on behalf of Ms Eicher, counsel states as follows:

1. Jolene Eicher is before the Court charged by Information with violations of one count each of: Entering and Remaining in a Restricted Building, 18 U.S.C. § 1752(a)(1); Disorderly and Disruptive Conduct in a Restricted Building, 18 U.S.C. § 1752(a)(2); Violent Entry and Disorderly Conduct on a Capitol Building, 40 U.S.C. §5104(e)(2)(D); and Parading, Demonstrating, or Picketing in a Capitol Building, 40 U.S.C. §5104(e)(2)(G). A trial date is set for 5th June 2023.
2. On 1st February 2023, following discussions with government counsel and Ms Eicher, counsel filed a Consent Motion to Vacate the currently set trial date. The Court denied that Motion on the same date.
3. At a status hearing on 9 March 2023, the Court indicated it would be willing to consider appointing new counsel for Ms Eicher, should she wish. After significant consultation between counsel and Ms Eicher, Ms Eicher asserts she would request the Court appoint

new counsel and to allow current counsel to withdraw in this matter. Ms Eicher requests the Court appoint new counsel forthwith.

4. Counsel has engaged the assigned Assistant U.S. Attorney on this matter: Mr Christopher Brunwin. Mr Brunwin is aware of this request.

WHEREFORE, for the above reasons, undersigned counsel and Jolene Eicher, respectfully request that this Court grant this Motion to Replace Counsel in the above-captioned proceeding and to appoint new counsel.

Respectfully Submitted,

/s/ Peter A. Cooper

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Counsel for Jolene Eicher

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Motion to Replace Counsel is being filed via the Electronic Court Filing System (ECF), causing a copy to be served upon government counsel of record, this 14th day of March, 2023.

/s/ Peter A. Cooper

Peter A. Cooper