

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

UNITED STATES OF AMERICA,)
)
)
)
v.) Case No. 23-CR-87 (RBW)
)
Jesse Watson,)
)
Defendant.)

**DEFENDANT’S MOTION TO SUBSTITUTE COUNSEL AND ORDER TO WITHDRAW
FORMER COUNSEL**

Comes now, Defendant Watson, by and through undersigned counsel, and files this Motion to Substitute Counsel and Withdraw Former Counsel. Undersigned counsel seeks appointment as Mr. Watson’s CJA appointed counsel and requests that the Court enter an order withdrawing his former CJA counsel, Gregory B. English, DC Bar#398564 in this matter. In support of this motion undersigned counsel states the following:

1. On November 12, 2022 Mr. English filed a notice of appearance in this matter. (ECF 15).
2. Undersigned counsel was the paralegal on this case, assisting Mr. English with the large volume of electronic and video discovery and reviewing this discovery with the client. Although only acting as a paralegal in this case, undersigned counsel is a practicing attorney and a member of this Court.

3. On May 12, 2023 Mr. Watson entered a plea of guilty to one count of Title 40, United States Code, Section 5104 (e)(2)G), Parading, Demonstrating, or Picketing in a Capitol Building. (ECF 41).
4. Mr. Watson is currently set for sentencing before this Court on August 25, 2023 at 10:00 am via zoom.
5. On Monday, June 26 2023, undersigned counsel was contacted by Mr. English's office assistant and informed that Mr. English was in the hospital with a grave illness, but that he wished to speak to me regarding this case.
6. Undersigned counsel called Mr. English at the number provided by his assistant and spoke with Mr. English briefly at the hospital. He requested that I take over Mr. Watson's case due to a recent serious medical diagnosis requiring his immediate withdrawal from all his matters and retirement from the practice of law.
7. Undersigned counsel told Mr. English that she would handle this matter for him and that she would file any necessary motions for his withdrawal as he would not be able to do so in his current condition.
8. Undersigned counsel then contacted Mr. Watson and the Assistant United States Attorney assigned to this matter with the information regarding Mr. English's health.
9. Mr. Watson desires for undersigned counsel to be appointed to handle the sentencing in this matter and any other matters that may arise in his case.
10. The government's counsel has no objection to such appointment in substitution for Mr. English.

Based on the foregoing, Mr. Watson respectfully requests that undersigned counsel be substituted for his former counsel and an order withdrawing former counsel be entered in this matter.

Respectfully Submitted,

By: Nicole Cubbage

 /s/

Nicole Cubbage

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Certificate of Service

I certify that a copy of the forgoing was filed electronically for all parties of record on this 28th day of June, 2023.

 /s/

Nicole Cubbage