

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO.: 6:21-cr-00141-RBD-UAM-1

v.

EMMETT BOWENS,

Defendant.

MOTION TO WITHDRAW AS COUNSEL

Brian L. Shrader, Esq., proceeding under Local Rule 2.02(c), moves to withdraw from representing Defendant, Emmettt Bowens, (“Defendant” or “Mr. Bowens”) in this action.

1. Counsel has encountered irreconcilable differences with the Defendant and professional considerations require termination of representation. Undersigned counsel certifies that the client consents to the withdrawal. Further, the withdrawal is being made at the request of the Defendant.
2. The withdrawal will not result in Defendant proceeding *pro se* so long as Criminal Justice Act counsel is appointed, a current address for the Defendant is included below.

3. This Motion is made in good faith and, in view of the present status of this matter, will not result in prejudice to any party. Additionally, the withdrawal will not result in a continuance of trial.

4. The requested relief is not being sought for purposes of delay or for any other improper purpose and will ensure the proper administration of justice in protecting the interest of Defendant.

5. Shrader, Mendez, & O'Connell is providing a copy of this motion to Defendant via USPS mail and electronic mail at the last-known address:

Emmett Bowens, Booking #202400014005
John E. Polk Correctional Facility
211 Eslinger Way
Sanford, FL 32772
taquandabl@gmail.com

LOCAL RULE 2.02(c)(i) CERTIFICATION

Defendant, Emmett Bowens, hereby consents to Brian L. Shrader, Esq.'s Motion to Withdraw as Counsel.

Emmett Bowens
Client Printed Name

3-13-25
Date


Client Signed Name

LOCAL RULE 3.01(g) CERTIFICATION

I have conferred with the opposing party, Assistant United State Attorney, Amanda Sterling Daniels, Esq., ("AUSA Daniels"), who takes no position as to the requested relief.

Dated: March 13, 2025

Respectfully Submitted,

SHRADER, MENDEZ & O'CONNELL

902 North Armenia Ave

Tampa, Florida 33609

Phone: (813) 360-1529

Fax: (813) 336-0832

/s/Brian L. Shrader

BRIAN L. SHRADER, ESQ.

Florida Bar No.: 57251

e-mail: bshrader@shraderlawfirm.com

Attorney for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 13, 2025, a true and correct copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to counsel of record.

/s/Brian L. Shrader

Attorney