

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
DUBLIN DIVISION**

UNITED STATES OF AMERICA :
 : **Case No. 3:22-CR-09**
V. :
 :
GLADYS HARUN, :
DEFENDANT. :
 :

MOTION TO WITHDRAW AS ATTORNEY OF RECORD

COMES NOW, undersigned counsel, and hereby files their Motion to Withdraw as Attorneys of Record in the above-captioned matter. In support thereof, counsel states the following:

(1)

Gladys Harun is charged in a seven-count Indictment with the following offenses: False Declaration, in violation of 18 USC § 1623, Wire Fraud, in violation of 18 USC § 1343 (two counts), and Money Laundering Transaction over \$10,000, in violation of 18 USC §1957 (four counts).

(2)

On February 9, 2023, undersigned counsel was retained to represent Ms. Harun to represent her in the above-referenced Indictment.

(3)

On April 27, 2023, Ms. Harun entered a guilty plea to Count One of an Information pursuant to a written plea agreement.

(4)

Undersigned counsel was informed by Ms. Harun that she is terminating his services, and that she is refusing to pay him as contractually agreed.

(5)

Counsel cannot zealously and effectively represent Ms. Harun due to her decision to terminate his services and her refusal to pay him as agreed.

(6)

Counsel provided the Initial Pre-Sentence Report to Ms. Harun and has advised her in writing of all applicable deadlines to file objections thereto.

(7)

This request for withdrawal will not delay the sentencing hearing or otherwise interrupt the orderly operation of the Court or be manifestly unfair to Ms. Harun.

WHEREFORE, counsel respectfully requests an Order permitting him to withdraw from this matter.

Respectfully submitted this 6th day of July 2023.

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing Motion to Withdraw upon opposing counsel using the CM/ECF system which will send email notification of such filing to the opposing counsel of record:

Mr. Louis Alexander Hamner, Esq.
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Respectfully submitted,

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