

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

v.

22 Cr. 251 (LJL)

RAFAEL MARTINEZ,

Defendant.

**MOTION AND DECLARATION PURSUANT TO LOCAL CIVIL RULE 1.4
AND LOCAL CRIMINAL RULE 1.2
FOR LEAVE TO WITHDRAW AS ATTORNEY OF RECORD**

I, Russell J. Feldman, an attorney of record for Defendant Rafael Martinez hereby move the Court pursuant to Local Civil Rule 1.4 and Local Criminal Rule 1.2 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an order, substantially in the form attached hereto as **Exhibit A**, granting me leave to withdraw as attorney of record in this action. In support thereof, and pursuant to 28 U.S.C. § 1746, I declare as follows:

1. Effective as of the close of business on July 6, 2023, I will no longer be associated with Morvillo Abramowitz Grand Iason & Anello P.C. (“Morvillo Abramowitz”), which firm represents Rafael Martinez in this action.

2. Morvillo Abramowitz, including Elkan Abramowitz and Telemachus P. Kasulis, will continue to represent the aforementioned party in this action. Mr. Abramowitz and Mr. Kasulis are fully familiar with the litigation and proceedings to date. Mr. Martinez will also continue to be represented by Willkie Farr & Gallagher LLP, including Michael Schachter and Randall Jackson, who are fully familiar with the litigation and proceedings to date.

3. Because the Motion herein will not result in a change of the law firms representing Mr. Martinez, I respectfully submit that my withdrawal as counsel of record will not affect this action in any way, will not alter the posture of the case, and will not prejudice any party.

4. I am not asserting a retaining or charging lien.

5. For the foregoing reasons, I hereby request that I be removed as counsel of record from the Electronic Case Filing (“ECF”) system, and that no further documents, notices, or other pleadings in this action be served upon me.

6. The filing of this Motion electronically using the Court’s ECF system constitutes good and proper service on all parties and their registered attorneys of record. A copy of this Motion and Exhibit A shall also be provided to Rafael Martinez.

7. I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 6, 2023
New York, New York

MORVILLO ABRAMOWITZ GRAND
IASON & ANELLO P.C.

By: s/ Russell J. Feldman
Russell J. Feldman

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