

UNITED STATES DISTRICT COURT  
DISTRICT OF NORTH DAKOTA

|                                                                                                        |                                                                      |
|--------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|
| UNITED STATES OF AMERICA,<br><br>Plaintiff,<br><br>vs.<br><br>ROSS SYLVESTER ELENDU,<br><br>Defendant. | Case No. 3:24-CR-142<br><br><b>MOTION TO WITHDRAW AS<br/>COUNSEL</b> |
|--------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|

Erich M. Grant, Attorney for the Defendant, moves the Court for its order allowing him to withdraw as counsel for the Defendant, Ross Sylvester Elendu, based upon the following cause:

1. There has been a complete and irretrievable breakdown of the attorney-client relationship whereby effective representation is no longer possible.
2. The Defendant has demanded that the undersigned withdraw as his counsel.
3. Reasonable efforts have been made to resolve these issues but to no avail.
4. The defendant has been convicted by a jury and is in detention pending sentencing on April 2, 2026, at 1:30 PM. Sufficient time remains for the defendant to retain new counsel in advance of his sentencing hearing. He would not be prejudiced by withdrawal.

Based upon the forgoing reasons, Counsel for the Defendant respectfully moves to withdraw as counsel for the Defendant.

Dated this 20<sup>th</sup> day of February, 2026.

McGEE, HANKLA, & BACKES, P.C.

BY: /s/ Erich M. Grant

Erich M. Grant (ND ID# 07593)

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*Attorney for the Defendant*

**CERTIFICATE OF SERVICE**

Erich M. Grant, counsel for the Defendant, hereby certifies that the foregoing document was served upon the following:

By Certified Mail:

Ross Elendu #2025004029  
Sherburne County Jail  
13880 Business Ctr Dr., NW, Suite 200  
Elk River, MN 55330

By Electronic Filing:

Matthew Greenley  
Assistant U.S. Attorney  
[matthew.greenley@usdoj.gov](mailto:matthew.greenley@usdoj.gov)

Dated this 20<sup>th</sup> day of February, 2026.

McGEE, HANKLA, & BACKES, P.C.

BY: /s/ Erich M. Grant  
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