UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, v. JOSE BIAOU, Defendant.	Case No.: 1:24-cr-00323-CRC

MOTION TO WITHDRAW AS COUNSEL

Attorney Alec A. Levy respectfully moves this Court for leave to withdraw as counsel for Defendant Jose Biaou pursuant to Local Rule 44.5. In support of the Motion, Mr. Levy states as follows:

1. Mr. Levy of Quinn Emanuel Urquhart and Sullivan, LLP ("Quinn Emanuel") is counsel of record for Defendant in the above-captioned matter, along with co-counsel Ubong Akpan from the Office of the Federal Public Defender for the District of Columbia.
2. Irreconcilable differences have arisen between Quinn Emanuel and Mr. Biaou.
3. Withdrawal at this stage will not unduly prejudice Mr. Biaou or delay these proceedings. Mr. Biaou will continue to be ably represented by co-counsel Ubong Akpan of the Office of the Federal Public Defender for the District of Columbia, whose representation of Mr. Biaou predates Quinn Emanuel's involvement in this matter.
4. Ms. Akpan is fully familiar with the pretrial motions filed on Mr. Biaou's behalf, the discovery produced in this case, and Mr. Biaou's defenses. The continuity of Ms. Akpan's representation ensures that Mr. Biaou will suffer no disruption or gap in counsel.
5. Quinn Emanuel has informed Mr. Biaou of its intent to withdraw and will serve a copy of the Motion on Mr. Biaou as required by Local Rule 44.5(d).

WHEREFORE, Alec A. Levy respectfully requests that this Court grant leave to withdraw as counsel of record for Defendant.

Dated: December 31, 2025

/s/ *Alec A. Levy*
Alec A. Levy (DC Bar No. 1616241)
QUINN EMANUEL URQUHART & SULLIVAN, LLP
1300 I Street NW, Suite 900
Washington, District of Columbia 20005-3314
(202) 538-8000
aleclevy@quinnemanuel.com