UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 21-20242-Cr-ALTONAGA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSEPH TIMOTHY GRENON,

Defendant.
_____/

MOTION TO WITHDRAW AS COUNSEL OF RECORD

COMES NOW, undersigned counsel, PAUL J. DONNELLY, and moves this Honorable Court to grant this Motion to Withdraw as CJA Counsel of Record for Defendant Joseph Timothy Grenon. In support of this motion, undersigned counsel states:

1. This Honorable Court appointed undersigned counsel under the Criminal Justice Act to represent Mr. Grenon in the instant matter. Originally, this Court appointed the undersigned to serve as standby counsel for Mr. Grenon, as Mr. Grenon insisted on representing himself.

2. Defendant Grenon was transferred from the Federal Detention Center–Miami to the Federal Medical Center-Fort Worth for the Bureau of Prisons to conduct a competency evaluation of Mr. Grenon that was ordered by this Court. Mr. Grenon was not returned to the FDC-Miami until after Thanksgiving but before Christmas Day.

3. After Mr. Grenon returned to the FDC-Miami, the undersigned attempted to conduct a legal visit with Mr. Grenon at the facility; however, staff at the facility told the undersigned that Mr. Grenon refused the legal visit.

4. Undersigned counsel then sent a letter to Mr. Grenon attempting to clarify whether

Defendant refused the legal visit, and this letter was returned to the undersigned by the Bureau of Prisons with a memorandum from the BOP indicating Mr. Grenon refused to accept the legal mail sent by the undersigned.

5. Since Mr. Grenon has refused the in-person visit with his counsel and refused to open mail from his appointed counsel, there is no active communication between Grenon and his counsel. As a result of this utter lack of communication, the undersigned seeks leave of this Court to withdraw as counsel of record.

6. This motion is filed in good faith and only for the reasons alleged herein.

7. A proposed Order is attached to this filing.

WHEREFORE, undersigned counsel respectfully requests that this Honorable Court GRANT the present motion and discharge the undersigned as CJA counsel of record.

Respectfully submitted,

PAUL J. DONNELLY, P.A.
One N.E. 2nd Avenue
Suite 200
Miami, FL 33132
Tel: 305-757-3331
Mobile: 786-258-4226
Donnellylaw@bellsouth.net

/s/ */Paul J. Donnelly/*
PAUL J. DONNELLY
Florida Bar No. 963895

Certificate of Service

I HEREBY CERTIFY that on this 25th day of JANUARY 2023, I electronically filed the foregoing document with the Clerk of Court using CM/ECF.

/s/ */Paul J. Donnelly/*
PAUL J. DONNELLY