

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI**

UNITED STATES OF AMERICA,)	
)	
)	
)	
Plaintiff,)	
)	
)	No. 08-00297-09-CR-W-FJG
)	
Anahit Nshanian)	
)	
)	
Defendant.)	

**MOTION TO WITHDRAW AS LOCAL COUNSEL
WITH SUGGESTIONS IN SUPPORT**

COMES NOW John R. Osgood, and hereby moves the court for leave to withdraw as local counsel in the above matter. As grounds therefore, counsel states:

1. Counsel no longer has a satisfactory working relationship with California counsel, Mr. Emerson. It is local counsel's position that local counsel is obliged and obligated to perform certain legal duties and tasks for the client pursuant to Local Rule 83.5 to adequately represent the client as local counsel and protect himself from eventual potential claims of ineffective assistance of counsel and malpractice.

2. Local Counsel and lead counsel, Mr. Emerson, do not appear to be in agreement as to what this entails and have reached an impasse in their working relationship which could ultimately impact adversely on the client.
3. Counsel was informed by electronic mail by Mr. Emerson that he (local counsel) has been discharged. Local Counsel is unaware of the client's position on this but based on exchanges of electronic mail with Mr. Emerson, counsel is under the assumption that those are her wishes too.

WHEREFORE, counsel moves the court for leave to permanently withdraw as local counsel and revoke and declare null and void his previously filed *pro hac vice* motion in the above matter and such other relief as the Court deems appropriate.

Respectfully submitted,

/s/

John R. Osgood
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CERTIFICATE OF SERVICE

I, John R. Osgood, certify that a copy of this pleading has been caused to be served on government counsel and all other defense counsel of record via the electronic court filing system (ECF) on today, Tuesday, March 10, 2009.

I further certify that a copy of this pleading was served on this date on the client, Ms. Nshanian, by separate electronic mail.

/s/

JOHN R. OSGOOD

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