

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

UNITED STATES OF AMERICA,)
PLAINTIFF,)
)
v.) Criminal Action No.
) 11-0157-01-CR-W-HFS
PETER J. LOMBARDO,)
DEFENDANT.)

Motion to Withdraw

Comes now Michael L. Barrera, attorney of record for Defendant Peter J. Lombardo and moves this Court grant counsel's motion for leave to withdraw as counsel of record. In support of this motion counsel states:

1. Counsel was appointed to represent Defendant Lombardo on July 25, 2011
2. This case is set for trial on March 19, 2012
3. Counsel has accepted a position in Denver, Colorado that begins October 3 and will need to move there by October 24, 2011
4. Counsel can no longer effectively represent the Defendant from another state and the responsibilities of his new position will not allow him time to represent Defendant
5. There are no other motions currently pending.
6. Counsel has the necessary discovery available to transfer to new counsel and will be available to answer any questions new counsel may have.
7. Counsel informed Defendant of his plans to file a Motion to Withdraw on September 26, 2011.

WHEREFORE, Counsel Michael L. Barrera respectfully moves this court grant counsel's Motion to Withdraw as attorney of record for Defendant Peter Lombardo and appoint said Defendant new counsel.

Respectfully submitted,

/s/Michael L. Barrera (Mo. Bar 40998)
3711 W. 47 Place
Shawnee Mission, KS 66205
913-461-2499
Attorney for Muhammad Rollie

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Motion was served on AUSA Chuck Ambrose and all defense attorneys of record by CM/ECF this 27th day of September, 2011.

/s/Michael L. Barrera