

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

UNITED STATES OF AMERICA, )  
Plaintiff, )  
)  
v. ) Criminal Action No.  
) 10-00320-19-CR-W-DGK  
MUHAMMAD IBRAHIM ROLLIE, )  
Defendant. )

**Motion to Withdraw**

Comes now Michael L. Barrera, attorney of record for Defendant Muhammad Rollie 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 Rollie on March 23, 2011
2. This case is set for trial on March 19, 2012
3. On or about September 22, 2011 Counsel accepted a position of employment in Denver, Colorado that begins October 3 and will need to move to Denver by October 24, 2011.
4. Counsel can no longer effectively represent the Defendant due to the responsibilities of his new position and the distance.
5. A Motion to Suppress has been filed in this matter and a hearing was held on July 27, 2011. A decision is still pending. There are no other motions currently pending.
6. Counsel has the necessary discovery available to transfer to new counsel. Counsel will also be available to new counsel for any questions.
7. Counsel personally visited with Defendant Rollie on September 26 and advised him of counsel's need to withdraw and other pending matters.

WHEREFORE, Counsel Michael L. Barrera respectfully moves this court grant counsel's Motion to Withdraw as attorney of record for Defendant Muhammad Rollie 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 Bruce Rhoades and all defense attorneys of record by CM/ECF this 27 day of September, 2011.

/s/Michael L. Barrera