

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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HON. BENNIE G. THOMPSON, )  
in his personal capacity, )  
HON. KAREN R. BASS, )  
in her personal capacity, )  
HON. STEPHEN I. COHEN, )  
in his personal capacity, )  
HON. VERONICA ESCOBAR, )  
in her personal capacity, )  
HON. PRAMILA JAYAPAL, )  
in her personal capacity, )  
HON. HENRY C. JOHNSON, JR., )  
in his personal capacity, )  
HON. MARCIA C. KAPTUR, )  
in her personal capacity, )  
HON. BARBARA J. LEE, )  
in her personal capacity, )  
HON. JERROLD NADLER, )  
in his personal capacity, )  
HON. MAXINE WATERS, )  
in her personal capacity, and )  
HON. BONNIE M. WATSON COLEMAN, )  
in her personal capacity )  
)  
Plaintiffs, )  
v. )  
)  
DONALD J. TRUMP, )  
solely in his personal, capacity, )  
RUDOLPH W. GIULIANI, )  
OATH KEEPERS, )  
PROUD BOYS INTERNATIONAL, .LLC )  
WARBOYS LLC, and )  
ENRIQUE TARRIO )  
)  
Defendants. )  

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Civil Case No. 1:21-CV-400-APM  
Honorable Amit P. Mehta

**MOTION TO WITHDRAW  
AS COUNSEL FOR  
DEFENDANT OATH KEEPERS, ONLY**

Janette Louard (*pro hac vice  
motion to befiled*)  
Anthony P. Ashton, Bar No. MD0096  
Anna Kathryn Barnes, Bar No. 1719493  
(*motion for admission pending*)  
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**MOTION TO WITHDRAW AS COUNSEL  
FOR DEFENDANT OATH KEEPERS, ONLY**

NOW COMES PENTIUK, COUVREUR & KOBILJAK, P.C., and Kerry L. Morgan Counsel for Defendant, OATH KEEPERS, Only, and pursuant to LCR 83.6, and for its Motion to Withdraw as Counsel for Defendant Oath Keepers Only, states as follows:

1. Pentiuk, Couvreur & Kobiljak, P.C. and Kerry L. Morgan are counsel for Defendant, OATH KEEPERS, Only, in this matter.

2. That Defendant, Oath Keepers, has not communicated or responded to counsel after counsel reached out several times and there has been a breakdown of communication.

3. That Defendant, Oath Keepers, has not paid it's legal fees and costs due and owing to Pentiuk, Couvreur & Kobiljak, P.C. and have not provided information to the undersigned, if and when, the legal fees and costs will be paid.

4. Counsel also requested Oath Keepers obtain substitute counsel in avoidance of this Motion, but have received no such substitution.

5. On November 1, 2021 Defendant, Oath Keepers, was advised that the motion herein would be filed with this Court on November 10, 2021 and withdrawing from this matter if no substitution of counsel was received.

6. On November 10, 2021, Pentiuk, Couvreur & Kobiljak, P.C. did not hear from Defendant, Oath Keepers, nor receive a substitution of counsel, necessitating the filing of this motion.

WHEREFORE, Pentiuk, Couvreur & Kobiljak, P.C. and Kerry L. Morgan respectfully request this Honorable Court grant the following relief:

1. Grant the motion to withdraw as counsel for Defendant, Oath Keepers, Only; and

2. Order Defendant Oath Keepers to retain new counsel and an Appearance of new counsel be filed within thirty (30) days of the filing of an Order.

Respectfully submitted,

PENTIUK, COUVREUR & KOBILJAK, P.C.

BY: /s/Kerry L. Morgan  
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Dated: November 11, 2021

**BRIEF IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL**

The undersigned, PENTIUK, COUVREUR & KOBILJAK, P.C. states the following in support of its Motion to Withdraw as Counsel for Defendant, Oath Keepers, Only:

The undersigned relies on the facts and law in the attached Motion.

Respectfully submitted,

PENTIUK, COUVREUR & KOBILJAK, P.C.

BY: /s/Kerry L. Morgan  
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[kmorgan@pck-law.com](mailto:kmorgan@pck-law.com)

Dated: November 11, 2021

**CERTIFICATE OF SERVICE**

On November 11, 2021, I certify that I electronically filed this document with the Clerk of the Court through the ECF System, which will send notification of such electronic filing to all counsel of record registered electronically and on this date also served Defendant, Oath Keepers, via first class mail, U.S. Postal Service at their last known address of: Mr. Stewart Rhodes, Founder and President of Oath Keepers, 1030 E. Hwy. 377, Suite 110-285, Granbury, TX 76048 and Kellye SoRelle, Oath Keepers General Counsel located at 922 W. Pearl Street, Granbury, TX 76048.

*Kerry L. Morgan*  
Kerry L. Morgan, Esq.