UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

GYLCOBIOSCIENCES INC.	)	
	)	
Plaintiff	)	
	)	
v.	)	Civil Action No. 1:12-cv-01901
	)	
INNOCUTIS HOLDINGS LLC *et al*.	)	
	)	
Defendants	)	
	)	

MOTION OF JOSEPH J. ZITO TO WITHDRAW
AS COUNSEL FOR PLAINTIFF GLYCOBIOSCIENCES, INC.

The undersigned, Joseph J. Zito, hereby moves to withdraw as counsel for Plaintiff GlycoBioSciences, Inc., and in support thereof states as follows:

Undersigned is currently the counsel of record for Plaintiff GlycoBioSciences, Inc., having agreed to re-enter this matter after Glyco terminated its representation by the Akerman Law Firm in May, 2016. Mr. Zito has attempted to provide advice and counsel to Glyco in this matter since May. However, current circumstances in the professional relationship between Glyco and counsel make it impossible for counsel to continue to represent GlycoBioscience interests in this matter in the manner desired by Plaintiff GlycoBioSciences. Plaintiff Glyco is currently discussing representation by new counsel.

The undersigned certifies that this motion is not being filed for purposes of delay.

No trial date has been set in this matter, the pending response to the motions for Summary Judgement is set for August 12, and Plaintiff fully intends to file its opposition brief by that date. Discovery is completed except for a second deposition of Plaintiff which has been

set for the week of August 8th. Neither Plaintiff nor Defendant's will be prejudiced by this withdrawal.

Undersigned counsel has conferred with counsel for Defendants and counsel for defendants has not indicated consent or opposition.

WHEREFORE, the undersigned respectfully requests this Court grant this Motion to Withdraw as Counsel, and enter any other Orders as it deems just and proper.

DATED this 25th day of July, 2016.

Respectfully submitted,

/s/ Joseph J. Zito
Joseph J. Zito
DNL ZITO
1250 Connecticut Ave, NW Suite 200
Washington, DC 20036
202-466-3500
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing **MOTION TO WITHDRAW** was filed electronically this 25th day of July, 2016. Notice of this filing will be sent to all counsel by operation of the Court's electronic filing system.

/s/ Joseph J. Zito
Joseph J. Zito

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

GYLCOBIOSCIENCES INC.	)	
	)	
Plaintiff	)	
	)	
v.	)	Civil Action No. 1:12-cv-01901-RDM
	)	
INNOCUTIS HOLDINGS LLC *et al.*	)	
	)	
Defendants	)	
	)	

[PROPOSED] ORDER GRANTING THE MOTION OF JOSEPH J. ZITO TO WITHDRAW AS COUNSEL FOR PLAINTIFF

This matter is before the Court on Mr. Joseph J. Zito's Motion to Withdraw as Counsel for Plaintiff GlycoBioSciences, Inc. Upon consideration of the Motion, it is hereby

ORDERED that the motion is **GRANTED.**

So entered this _____ day of _____, 2016.

_____
The Honorable Randolph D. Moss
United States District Court Judge