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	)	

REVISED SECOND MOTION OF JOSEPH J. ZITO TO WITHDRAW
UNDER LOCAL RULE 83.6(c)
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 GlycoBioSciences interests in this matter in the manner desired by Plaintiff GlycoBioSciences. Plaintiff Glyco is currently discussing representation with new counsel.

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

Neither Plaintiff nor Defendant's will be prejudiced by this withdrawal.

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. On July 17, 2016, Defendants' counsel requested that the date for the close of depositions be set back to August 12. On July 15, Plaintiff's counsel agreed. On July 16, Plaintiff's counsel confirmed the availability of Mr. Drizen for his deposition on August 11. On July 18, Defendants' counsel confirmed the August 11th date. (*See Exhibit A*)

Mr. Drizen's deposition has been set by agreement of counsel for August 11, 2016.

On July 22nd, counsel for Defendants, in acknowledging that the Drizen deposition had been set for August 11, remembered that he had a personal conflict that week: "Lastly, on a personal level, we have a grandchild due to be born on August 9th, so I would prefer to keep that week open." Counsel for Defendants requested a resetting of the date and also requested a change in location of the deposition. (*See Exhibit B)*

The August 11 date was not cancelled. Plaintiff's counsel simply replied that: "Glyco will get back to you on dates and location availability." Plaintiff's counsel will do what is possible to accommodate the personal conflicts of Defendants' counsel, however no deposition was canceled based upon a request. The second Drizen deposition remains set for August 11, 2016 in Toronto, and Mr. Drizen will appear on that date, unless a change is agreed to by the parties or counsel.

Compliance with Meet and Confer Requirements

Undersigned counsel has conferred with counsel for Defendants and counsel for defendants has indicated that Defendants will oppose this motion.

Compliance with Local Civil Rule 83.6(c)

No trial date has been set, however, Plaintiff's written consent has not been obtained and Plaintiff has not yet retained other counsel. Plaintiff has been informed of the decision to

withdraw, has been served with this motion as well as the previous motion and has been advised to obtain other counsel and has been advised that if Plaintiff objects to the withdrawal, Plaintiff must notify the Clerk in writing within seven days of service of the motion. Plaintiff is a corporation and thus cannot proceed *pre se.*

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 27th day of July, 2016.

Respectfully submitted,

/s/ Joseph J. Zito
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing **REVISED SECOND MOTION TO WITHDRAW** was filed electronically this 27th day of July, 2016. Notice of this filing will be sent to all counsel by operation of the Court's electronic filing system.

The undersigned further certifies that Plaintiff was served with a copy of this motion through its two corporate representatives by e-mail as listed below and served by Express Mail on its Corporate headquarters as listed below. In addition to a copy of this Motion, Plaintiff was also served with a Letter from counsel advising Plaintiff to obtain other counsel, or, if the party intends to object to the withdrawal, to so notify the Clerk in writing within seven days of service of the motion.

Kevin Drizen, President
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Paolo Palone, Corporate Officer
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/s/ Joseph J. Zito
Joseph J. Zito