

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

v.

CHRISTOPHER QUAGLIN

Defendant.

Case No. 21-CR-40 (TNM)

MOTION TO WITHDRAW AS COUNSEL

Joseph D. McBride, an attorney of record for Christopher Quaglin, a defendant in the above-captioned case, hereby respectfully moves this Honorable Court for an order allowing him to withdraw as attorney of record.

STATEMENT OF FACTS

I am the attorney of record in several January 6th related matters, including USA v. Ryan Taylor Nichols, 21-cr-117-RCL, a complex multi-defendant case scheduled for trial on March 27, 2023. Trial preparation for the Nichols case and the breathtakingly large amount of discovery recently produced by the Government in every January 6th case has created a conflict for me where I cannot be ready for trial anytime soon in the above-captioned matter.

I recently notified Mr. Quaglin, and his family, of my conflict and agreed that attorney Jonathan S. Gross, currently the second chair in this case, should take over as lead counsel. Mr. Gross is signed as an attorney of record in Mr. Nichols's case. Mr. Gross will file a motion to withdraw from the Nichols case today to devote his time and attention to Mr. Quaglin. It is respectfully submitted that this request will not prejudice Defendant Quaglin because Mr. Gross, who knows Quaglin's case well, will assume the duties of lead counsel going forward.

WHEREFORE, it is respectfully requested that in consideration of the abovementioned facts, this court issue an order permitting undersigned counsel to withdraw as attorney of record and, by doing so, relieve him of any further obligation to this case.

Dated: New York, NY
March 6, 2022

Respectfully submitted,

/s/ Joseph D. McBride, Esq.

Bar ID: NY0403

THE MCBRIDE LAW FIRM, PLLC

99 Park Avenue, 6th Floor

New York, NY 10016

p: (917) 757-9537

e: jmcbride@mcbridelawnyc.com

Counsel for the Defendant