

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
UNITED STATES OF AMERICA,	:	
	:	
	:	
v.	:	S4 11-CR-205 (AKH)
	:	
NICOLAS MADURO MOROS, <i>et al.</i>	:	
	:	
Defendants.	:	
-----X	:	

**MOTION OF NICOLAS MADURO MOROS  
TO STRIKE APPEARANCE OF BRUCE FEIN**

Undersigned counsel represents Nicolas Maduro Moros in the above-captioned case (Dkt. 269) and appeared on his behalf at his initial appearance and arraignment (Dkt. 274). Bruce Fein subsequently filed a motion to appear in this case *pro hac vice* (Dkt. 271) and a notice of entry of appearance as counsel for Mr. Maduro (Dkt. 272). The Court granted that motion earlier today (Dkt. 277).

As set forth in the accompanying Declaration, neither undersigned counsel, nor anyone acting on his behalf, has authorized Mr. Fein to appear on behalf of Mr. Maduro. Mr. Maduro has not retained Mr. Fein nor authorized him to hold himself out as Mr. Maduro’s counsel. Mr. Maduro has authorized undersigned counsel to move to strike Mr. Fein’s appearance.

Undersigned counsel has conferred with counsel for the government. The government takes no position on this motion.

Dated: January 8, 2026

Respectfully submitted,

/s/ Barry J. Pollack

Barry J. Pollack

HARRIS ST. LAURENT & WESCHLER, LLP

1775 Pennsylvania Avenue, N.W., Suite 650

Washington, D.C. 20005

(202) 617-5971

bpollack@hs-law.com

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----	X	
	:	
UNITED STATES OF AMERICA,	:	
	:	
	:	
v.	:	S4 11-CR-205 (AKH)
	:	
NICOLAS MADURO MOROS, <i>et al.</i>	:	
	:	
Defendants.	:	
-----	X	

**PROPOSED ORDER**

Upon consideration of Mr. Maduro's Motion to Strike Appearance of Bruce Fein, any opposition thereto, and the entire record herein is by this \_\_\_\_ day of January, 2026 it is hereby

ORDERED that Mr. Maduro's Motion to Strike Appearance of Bruce Fein is GRANTED;  
and it is further

ORDERED that the appearance of Bruce Fein is hereby stricken.

---

The Hon. Alvin K. Hellerstein  
United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on this 8th day of January 2026, I filed the foregoing pleading through the ECF system, which shall then send an electronic copy of this pleading to all parties in this action.

/s/ Barry J. Pollack  
Barry J. Pollack