

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

v.

BRIAN KOLFAGE,
STEPHEN BANNON,
ANDREW BADOLATO, and
TIMOTHY SHEA

Defendants

No. 20 Cr. 412 (AT)

**DECLARATION OF WILLIAM A. BURCK IN SUPPORT OF MOTION TO
WITHDRAW AS COUNSEL**

I, William A. Burck, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner of the law firm of Quinn Emanuel Urquhart & Sullivan, LLP and a member in good standing of the bar of the State of New York and this Court. I respectfully submit this declaration pursuant to Local Criminal Rule 1.1(b) and Local Civil Rule 1.4 in support of the accompanying motion to withdraw as counsel of record for Defendant Stephen Bannon.

2. Mr. Bannon and Quinn Emanuel have mutually and amicably agreed that alternative counsel would be better suited to his defense strategy. Accordingly, Mr. Bannon is in the process of retaining new counsel in this matter and has consented to the substitution of counsel. He has represented that he anticipates retaining new counsel prior to the status conference scheduled in this matter for December 2, 2020.

3. Quinn Emanuel also has consented to substitution and is not asserting a retaining or charging lien.

4. The Indictment in this case was unsealed on August 20, 2020. The next status conference before the Court is set for December 2 at 3:00 PM. Trial currently is scheduled to begin in May 2021.

5. Because trial in this case is still many months away, the requested substitution of counsel and withdrawal of Quinn Emanuel will not unnecessarily delay this action. As a result, we respectfully request that the Court grant the motion to substitute and motion to withdraw.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 25, 2020

/s/ William A. Burck

William A. Burck