

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

UNITED STATES OF AMERICA

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Plaintiffs,

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v.

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NO. 1:17-CR-00034 (BKE)

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REALITY LEIGH WINNER

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Defendant.

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MOTION TO WITHDRAW AS CO-COUNSEL TO DEFENDANT

NOW INTO COURT, pursuant to Local Rule 83.7, undersigned counsel for Defendant Reality Leigh Winner respectfully requests leave for Jill E. McCook to withdraw as co-counsel of record for Defendant Reality Leigh Winner. In support of this motion, the undersigned counsel submit the following:

1. Jill E. McCook is terminating her employment with Baker, Donelson, Bearman, Caldwell & Berkowitz, P.C., to pursue a position with the Tennessee Valley Authority’s Office of the General Counsel, effective January 8, 2017.

2. Ms. McCook provided verbal notice to Ms. Winner of her intention to withdraw as co-counsel on December 29, 2017, and written notice by hand delivery on the same date. Ms. Winner provided her written consent to Ms. McCook’s withdraw, as evidenced by a true and correct copy of correspondence between Ms. McCook and Ms. Winner attached as **Exhibit A** to this Motion.

3. Ms. McCook's withdraw as co-counsel will not have a material adverse effect on the interests of Ms. Winner in the above-referenced case given the other attorneys of record, nor will her withdraw as co-counsel delay the trial of the case.

4. A proposed order granting the relief sought is attached as **Exhibit B**.

Wherefore, the undersigned counsel for Defendant Reality Leigh Winner respectfully request that this Court enter an order granting Jill E. McCook permission to withdraw as co-counsel of record, relieving her of any further responsibilities with respect to this matter.

This 19th day of January, 2018.

Respectfully submitted,

/s/

Joe D. Whitley

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Admitted *Pro Hac Vice*
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**COUNSEL FOR DEFENDANT
REALITY LEIGH WINNER**

CERTIFICATE OF SERVICE

I hereby certify that on January 19, 2018, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to counsel of record for all parties.

/s/

JOE D. WHITLEY

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BEARMAN, CALDWELL & BERKOWITZ, PC

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December 29, 2017

VIA HAND DELIVERY

Reality Leigh Winner
Lincoln County Jail
145 School Street
Lincolnton, GA 30817

Re: Notice of Intent to Withdraw as Co-Counsel
United States v. Reality Leigh Winner, Case No. 1:17-cr-0034

Dear Ms. Winner:

As we discussed on the phone on December 29, 2017, I am leaving my employment with Baker, Donelson, Bearman, Caldwell & Berkowitz, PC ("Baker Donelson"), effective January 8, 2018, to join the Tennessee Valley Authority's Office of the General Counsel. As such, I will be seeking leave from the Court to withdraw as co-counsel. Joe D. Whitley, Matthew S. Chester, Thomas H. Barnard, and Brett A. Switzer of Baker Donelson and John C. Bell and Titus T. Nichols of Bell & Brigham will continue as your counsel of record. By signing below, you indicate your consent to my withdraw and that my withdraw will not have a material adverse effect on your interests in the above-referenced case.

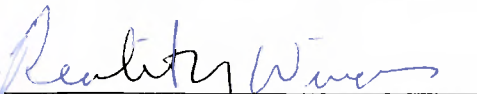
I wish you nothing but the very best.


Sincerely yours,

BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, PC


Jill E. McCook

AGREED AND ACCEPTED BY:


Reality Leigh Winner
Client


Date

Realty Leigh Winner
December 29, 2017
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cc: Joe D. Whitley
Matthew Scott Chester
Thomas H. Barnard
Brett A. Switzer
John Bell
Titus Nichols

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SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

UNITED STATES OF AMERICA

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NO. 1:17-CR-00034 (BKE)

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[PROPOSED] ORDER PERMITTING WITHDRAWAL OF CO-COUNSEL

For good cause shown, this Court hereby **GRANTS** the Motion to Withdraw as Co-Counsel to Defendant, and

IT IS HEREBY ORDERED that Jill E. McCook is terminated as counsel of record in this matter.

So ORDERED this _____ day of _____, 2018.

The Honorable Brian K. Epps
Magistrate Judge, U.S. District Court
of the Southern District of Georgia