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June 8, 2021

Honorable Ann M. Donnelly
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Robert Kelly, 19-286 (S-1)(AMD)

Dear Judge Donnelly:

On behalf of myself and Mr. Leonard, we respectfully request leave to withdraw our appearances as counsel of record in this matter. While we realize that this request comes close to trial - and although we are ready to proceed to trial as scheduled in August - our reasons for withdrawal are significant and it is impossible, in our belief, for us to be able to continue to properly represent Mr. Kelly under the current circumstances. If the Court deems it necessary, we are willing to serving as effective stand-by counsel.

The government was advised of our position and reasons in a phone call.

We are requesting that the Court set our request for hearing.

Thank you for your consideration.

Respectfully submitted,

/s/ Steve Greenberg

Steven A. Greenberg