

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

_____	)	
UNITED STATES OF AMERICA,	)	
	)	
	)	
v.	)	
	)	
JOHN W. HINCKLEY, JR.,	)	Crim. No. 81-306 (PLF)
	)	
Acquittee.	)	
_____	)	

**MOTION TO WITHDRAW AS COUNSEL**

Pursuant to LCvR 83.6(c) and LCrR 44.5(d) of the Local Rules of this Court, Dickstein Shapiro LLP, and each of its attorneys who have entered an appearance in this case – Barry Wm. Levine, Adam Proujansky, Ann-Marie Luciano, E. Michelle Tupper Butler, Jodi Trulove and John T. Kotelly – respectfully move this Court to withdraw as counsel for John W. Hinckley, Jr.

Rule 1.16 of the Rules of Professional Conduct of the District of Columbia Bar provides that a lawyer may withdraw from representing a client “if withdrawal can be accomplished without material adverse effect on the interests of the client, or if . . . [t]he client fails substantially to fulfill an obligation to the lawyer regarding the lawyer’s services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled . . . [or if the] representation will result in an unreasonable financial burden on the lawyer.”

As undersigned counsel has frequently noted during the lengthy course of the above-captioned action, the repeated hearings that the Government has insisted upon have been extremely expensive, even at the reduced rates that undersigned counsel has charged. There are significant outstanding legal bills in arrears, and the Hinckley family has informed undersigned

counsel that it will not provide future funding for attorneys' fees, expenses or related experts in this matter. Therefore, consistent with Rule 1.16, undersigned counsel respectfully move to withdraw as counsel. Such withdrawal will not unduly delay the case or materially prejudice Mr. Hinckley, especially in light of this Court's statement to counsel that it will not rule on the Hospital's pending conditional release motion until November. Mr. Hinckley has been advised of his options with respect to obtaining other counsel.

**CONCLUSION**

For the reasons set forth above, the undersigned request that the Court grant this motion to withdraw as counsel.

Dated: August 24, 2012

Respectfully submitted,

*/s/ Barry Wm. Levine*

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 24, 2012, copies of the foregoing document were served  
by electronic mail upon:

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And by hand delivery upon:

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/s/ Barry Wm. Levine

Barry Wm. Levine