

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA)	
)	
v.)	
)	
RICHARD W. GATES III,)	Crim. No. 17-201-2 (ABJ)
)	
Defendant.)	FILED UNDER SEAL

**MOTION FOR LEAVE TO FILE UNDER SEAL EXHIBIT 1 TO MOTION FOR LEAVE
TO WITHDRAW AS COUNSEL OF RECORD**

Undersigned counsel hereby moves this Court for leave to file under seal Exhibit 1 to be included with undersigned counsel's Motion for Leave to Withdraw as Counsel of Record. Undersigned counsel contends that despite the general policy that public access to judicial proceedings and judicial records is important to the proper functioning of our justice system, there is good cause and compelling reasons in this instance for the proposed attachment to not be publicly disclosed. More specifically, undersigned counsel seeks leave to file under seal Exhibit 1 to their proposed motion. The exhibit discloses private information regarding Mr. Gates. The Court has noted on more than one occasion that this case is subject to substantial publicity and media coverage. This exhibit involves highly sensitive matters concerning the Defendant and public disclosure of the information would potentially be prejudicial to the Defendant as well as embarrassing.

WHEREFORE, undersigned counsel hereby respectfully moves this Court for leave to file under seal Exhibit 1 to undersigned counsel's Motion for Leave to Withdraw as Counsel of Record.

Respectfully submitted,

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Exhibit 1
FILED UNDER SEAL

As a basis for counsel's motion to withdraw as counsel of record, undersigned counsel wish to inform the Court that irreconcilable differences have developed with the client which make our effective representation of the client impossible. Counsel is constrained by attorney-client privilege as to the specifics involved but understand that the Court may wish to inquire more specifically of counsel for the basis of this motion. Counsel will make themselves available to the Court for such inquiry in whatever forum the Court deems appropriate.

Respectfully submitted,

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