

**IN THE
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS---EASTERN DIVISION**

UNITED STATES OF AMERICA)	
)	
)	
VS)	08 CR 888
)	Honorable James B. Zagel
)	
ROD BLAGOJEVICH)	

MOTION TO WITHDRAW AS COUNSEL FOR FORMER GOVERNOR ROD BLAGOJEVICH

NOW COMES, attorneys Samuel F. Adam and Samuel E. Adam, and moves this Honorable Court to allow the same to withdraw as trial counsel for the Former Governor Rod Blagojevich in the instant cause. In support thereof the following is offered:

1. Former Governor Rod Blagojevich is charged before this Honorable Court with the indicted offenses of Wire Fraud, Mail fraud, Racketeering, and Conspiracy as outlined in the instant indictment.
2. Former Governor Blagojevich was tried in a jury trial from June 3, 2010 through August 23, 2010, which cause ended in a “hung” jury on 23 of 24 counts, and a finding of guilty on Count 24.
3. After the verdict was returned, the attorneys for the Government immediately informed the defense and Former Governor Blagojevich that it was seeking to retry the remaining counts.
4. This Court further informed the defense that because the Defendant was now seeking to have retained counsel be appointed by the Court, that this Court was going to stringently follow the CJA rules, and would allow the appointment of 2 lawyers and a single paralegal to represent Former Governor Blagojevich.
5. Such notification has made it impossible for the same trial team, which consisted of 14 lawyers, and more than 7 paralegals and staff, to stay intact and vigorously defend the charges as brought by the Government.
6. Thus, upon being notified of the change in defense counsel and assistance available, the defense team and Former Governor Blagojevich have had many meetings and conferences regarding which legal counsels and staff members were best suited to represent his interests in the next trial.

7. As a result of much discussion and collaboration, it has been agreed to by both Former Governor Blagojevich and the entire defense team, that attorneys Samuel F. Adam and Samuel E. Adam, not represent Former Governor Blagojevich at trial, but shall remain in an advisory position assisting with strategy and preparation for trial, in concert with his remaining trial counsels, Attorney Aaron Goldstein and Sheldon Sorosky

8. Both attorneys Samuel F. Adam and Samuel E. Adam remain constant in their advocacy of Former Governor Blagojevich's innocence, and shall continue to maintain a close working relationship with both Former Governor Blagojevich and his trial counsels. In fact, both Samuel F. Adam and Samuel E. Adam are dedicating the entire third floor of their law office to the remaining trial team for as long as necessary, and without reimbursement for that space. Furthermore, both Samuel F. Adam and Samuel E. Adam shall dedicate as much time as necessary to help with trial preparation and strategy *Pro Bono*.

9. Attorneys Samuel F. Adam and Samuel E. Adam request to withdraw only in the best interest of Former Governor Blagojevich, who after much consideration and reflection, has agreed that further representation is most effective by and through attorneys Goldstein and Sorosky.

WHEREFORE, Attorneys Samuel F. Adam and Samuel E. Adam respectfully request their appearances as counsel for Former Governor Blagojevich be withdrawn.

Respectfully submitted,

/s/ Samuel E. Adam

/s/ Samuel F. Adam