

APPENDIX A

Order Denying Limited Stay of Execution
and Limited Appearance, Case No. 2:16-
cv-01758-LSC-JEO, *Woods v. Stewart*
(ECF No. 42) (N.D. Ala. Mar. 3, 2020)

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

NATHANIEL WOODS,)
)
Petitioner,)
)
vs.) 2:16-cv-1758-LSC
)
CYNTHIA STEWART,)
Warden, Holman Correctional)
Facility, et al.)
)
Respondents.)

ORDER DENYING LIMITED STAY OF EXECUTION AND LIMITED APPEARANCE

The Court has before it Petitioner Nathaniel Woods' "Motion to File Limited Appearance." (Doc. 41). Even though counsel styled the motion as simply one for a limited appearance, it has attached exhibits exceeding 100 pages that are clearly separate motions for relief, such as for limited stay of execution, for substitution of counsel, petition for relief from judgment pursuant to Rule 32 of the Alabama Rules of Criminal Procedure, and several others. This Court interprets Woods' filing as not only a motion for limited appearance, but also as an attempted filing of all the other motions attached thereto. This Court lacks jurisdiction to consider the motion for the following reasons. Woods previously filed a 28 U.S.C. § 2254 motion that this Court denied. Woods appealed this Court's decision, which was affirmed by the Eleventh Circuit

Court of Appeals. In filing the instant motion, Woods did not obtain the required certification from the Eleventh Circuit Court of Appeals. "Before a second or successive application permitted by this section is filed in the district court, the applicant shall move in the appropriate court of appeals for an order authorizing the district court to consider the application." 28 U.S.C. § 2244(b)(3)(A).

The Antiterrorism and Effective Death Penalty Act of 1996 (AEDPA) established a stringent set of procedures that a prisoner "in custody pursuant to the judgment of a State court," 28 U.S.C. § 2254(a), must follow if he wishes to file a "second or successive" habeas corpus application challenging that custody, § 2244(b)(1). In pertinent part, before filing the application in the district court, a prisoner "shall move in the appropriate court of appeals for an order authorizing the district court to consider the application." § 2244(b)(3)(A). A three-judge panel of the court of appeals may authorize the filing of the second or successive application only if it presents a claim not previously raised that satisfies one of the two grounds articulated in § 2244(b)(2). § 2244(b)(3)(C); *Gonzalez v. Crosby*, 545 U.S. 524, 529–530, 125 S.Ct. 2641, 162 L.Ed.2d 480 (2005); see also *Felker v. Turpin*, 518 U.S. 651, 656–657, 664, 116 S.Ct. 2333, 135 L.Ed.2d 827 (1996).

Burton v. Stewart, 549 U.S. 147, 152–53, 127 S. Ct. 793, 796, 166 L. Ed. 2d 628 (2007).

Accordingly, Woods' filing (Doc. 41) does not re-open the above-styled case or grant this Court jurisdiction to consider the relief sought therein. The motion (doc. 41) is hereby DENIED as is all the motions attached thereto. This action, to the extent it could be argued that it was re-opened by Woods' filing, is DISMISSED.

DONE and **ORDERED** on March 3, 2020.



L. Scott Coogler
United States District Judge

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APPENDIX B

Order Denying Motion to Amend
Judgment Under FRCP 59(e), Case No.
2:16-cv-01758-LSC-JEO, *Woods v.*
Stewart (ECF No. 44) (N.D. Ala. Mar. 5,
2020)

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

NATHANIEL WOODS,)
)
Petitioner,)
)
vs.) 2:16-cv-1758-LSC
)
CYNTHIA STEWART,)
Warden, Holman Correctional)
Facility, et al.,)
)
Respondents.)

ORDER

The Court has before it Petitioner Nathaniel Woods’ “Motion to Alter or Amend Judgment Under FRCP 59(e).” (Doc. 43.) For the reasons explained below, the motion is due to be denied.

Woods previously filed a 28 U.S.C. § 2254 motion that this Court denied on July 18, 2018. Woods sought a certificate of appealability from the Eleventh Circuit Court of Appeals, which was denied on February 22, 2019. On October 9, 2019, the United States Supreme Court denied Woods’ Petition for Writ of Certiorari. On March 3, 2020 at 3:26 p.m., two days before his scheduled execution, Woods’ counsel, Alicia Haynes (“Haynes”), filed a “Motion to File Limited Appearance.”

(Doc. 41.) The same day at 5:00 p.m., this Court entered an order denying the motion. (*See* doc. 42.) This Court explained that it lacked jurisdiction over Woods' motion and that Haynes was required to seek a certification from the Eleventh Circuit Court of Appeals.

After this Court denied the motion, Haynes did not seek the required certification from the Eleventh Circuit. Instead, on March 4, 2020 at 4:42 p.m., again waiting until the latest hour possible, Haynes filed the instant motion to alter or amend (doc. 43) in this Court. Haynes avers that this Court had not been asked to rule on any request for substantive relief. Rather, Haynes contends that she simply sought to make a limited appearance so that Woods can "seek a stay in order to secure the appointment of new counsel to investigate and plead permissible avenues of relief." (Doc. 43 at 2.) Notwithstanding Haynes's compliance with General Order 2016-01 governing limited appearances, this Court nonetheless lacks jurisdiction to consider the claims that Haynes says she intends to bring in the course of her limited appearance.

First, the request for substitution of counsel is without merit. Pursuant to 18 U.S.C. § 3599(a)(2), Haynes (or her successor counsel) would be able to represent Woods only if Woods is "unable to obtain adequate representation." *See also Harbison v. Bell*, 556 U.S. 180, 189 (2009) (noting that § 3599(a)(2) "provides for

counsel only when a state petitioner is unable to obtain adequate representation"). Woods' current federal habeas counsel is adequate representation. This Court appointed John D. Lloyd ("Lloyd") as federal habeas counsel for Woods in his first § 2254 motion. It appears to the Court that Lloyd has not moved to withdraw or otherwise been released from representation. Haynes avers that Lloyd's representation was inadequate because he was working under an expedited briefing schedule and with limited financial resources. Haynes also avers that Lloyd refused to file the motion for stay. But these are insufficient to show that his representation has been and is inadequate. Moreover, because this Court lacks jurisdiction to review another application under § 2254, this Court lacks the authority to appoint counsel under § 3599 for an unauthorized second or successive application. *See Chavez v. Sec'y, Fla. Dep't of Corr.*, 742 F.3d 940, 946 (11th Cir. 2014) (finding that capital defendant would not be entitled to the substitution of, or appointment of, federal counsel to raise new claims in a second § 2254 petition when it would be futile).

The request for a stay is also without merit. The statute upon which counsel relies requires that the court in which the request is filed have jurisdiction to "entertain a habeas corpus application." *See* 28 U.S.C. § 2251(a)(3). As explained in its prior order, this Court does not have jurisdiction because any such application

would be successive, and Haynes has not sought an authorizing order from the Eleventh Circuit.

While it is for the Eleventh Circuit to decide whether Woods is permitted to bring a second or successive petition, it appears to this Court that Woods states no new grounds that were not available to Woods during his first § 2254 motion. If this Court were to allow Woods to reassert grounds previously raised, or grounds available to him before, this would be a never-ending process where defendants could wait until the last minute, reassert the same grounds, and thus delay the imposition of the sentence *ad infinitum*.

When Haynes filed her first motion, this Court worked to issue an order before the close of business so that counsel would have time to seek the required application from the Eleventh Circuit in accordance with this Court's instructions. Nonetheless, it appears to the Court that Haynes spent time not going to the Eleventh Circuit but instead filing another motion with this Court near the close of business, presumably in an effort to force a ruling from this Court based not on the merits but instead on the condensed time-frame in which it was brought. At this stage Woods must direct his requests to the Eleventh Circuit Court of Appeals. If Woods obtains the requisite permission from the Eleventh Circuit, this Court will certainly appoint

constitutionally adequate counsel to represent Woods, assuming this court finds that his current counsel is inadequate.

Accordingly, Woods' motion (doc. 43) is DENIED. This action, to the extent it could be argued that it was re-opened by Woods' filing, is DISMISSED.

DONE and ORDERED on March 5, 2020.



L. Scott Coogler
United States District Judge

APPENDIX C

Lauren Faraino Affidavit (Mar. 3, 2020)

State of Alabama
County of Jefferson

AFFIDAVIT OF LAUREN ELAENA FARAINO

1. My current full legal name is Lauren E. Faraino, SSN: XXX-XX-X151, born April 10, 1991.

2. My current address is 1321 Parliament Lane, Birmingham, AL 35216.

3. I am aware that Nathaniel L. Woods has been convicted of capital murder for the deaths of three Birmingham police officers, and that he was sentenced to death. I currently represent Nathaniel Woods in seeking executive clemency. I have been asked by attorneys from the American Bar Association (“ABA”) Death Penalty Representation Project to provide this statement detailing my knowledge of and involvement in Nathaniel’s case. I have provided this statement voluntarily and of my own free will.

4. I began reaching out to attorneys around the country about Nathaniel Woods’s death penalty case on or around February 20, 2020. It is my understanding that on February 25, 2020, an email I sent to various contacts asking them to please refer me to attorneys who could review the issues in Nathaniel’s case was forwarded to attorneys at the ABA Death Penalty Representation Project. These attorneys contacted me and requested that I send them any case information and records I had in my possession. I sent them various files, transcripts, and pleadings associated with Nathaniel’s case.

5. I have been a member of the New York State Bar since April 2017. I am currently licensed to practice in New York State. My legal background is in corporate and antitrust law as an associate at Wachtell, Lipton, Rosen & Katz, where I worked for nearly three years. In February 2019 I joined the investment practice Starr Enterprises, where I

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currently work. Since leaving corporate law, I have continued to accept certain limited pro bono projects.

6. I first learned about Nathaniel's case on February 5, 2020 through a news article regarding his pending execution date of March 5, 2020. After reading that Nathaniel had been sentenced to death despite not having shot the three police officers who were killed in the crime, I became curious about the grounds on which he was convicted and sentenced.

7. With the help of my legal assistant, Elaena Starr, I began conducting research into the case, including pulling court documents and news articles available online. The more I learned about the case, the more concerned I became about whether Mr. Woods was in fact guilty of capital murder and/or whether he had received competent legal representation.

8. Ms. Starr went to the Jefferson County Courthouse, where she read every page of the 22 volumes of transcripts from Nathaniel's trial. Ms. Starr paid to have copies made of each of these files so that she could continue to study them and pass them to me to evaluate possible legal claims. Through this research, we began to identify what appeared to be numerous critical errors and inconsistencies in Nathaniel's case and the evidence presented at trial.

9. On February 7, 2020, I contacted LaJuana Davis, whom I saw had been Nathaniel's state post-conviction lawyer. On February 8, 2020, Ms. Davis directed me to contact Marc Shapiro of Orrick Herrington & Sutcliffe in New York, New York, whom I learned was representing Nathaniel in a 42 U.S.C. § 1983 case in the Middle District of Alabama regarding method of execution.

10. I contacted Mr. Shapiro, offering to support the existing legal efforts. On February 10, 2020, I spoke with Mr. Shapiro and his colleague, Mr. Shane McCammon. They informed me that their team was only representing Nathaniel in connection with the §1983 complaint in federal district court regarding the execution protocol to be used

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during Nathaniel's execution but was not going to be able to investigate or bring any other litigation on behalf of Nathaniel.

11. Mr. Shapiro and Mr. McCammon asked me if I would be interested in drafting Nathaniel's clemency petition. I thought this was odd, as they did not mention whether Nathaniel's local counsel J.D. Lloyd had begun a clemency petition or would be involved in the drafting efforts. Because I wanted to help, I agreed to seek Nathaniel's consent to begin clemency efforts on his behalf.

12. Beginning on February 11, 2020, I began going to the Jefferson County Courthouse to read the files in Kerry Spencer's case. Kerry Spencer is Nathaniel's co-defendant and the confessed shooter in the murders of June 17, 2004. He has always proclaimed Nathaniel is innocent of any plot to murder the officers, and that he only shot the officers in self-defense. Inconsistencies in the testimony at Spencer's trial in June 2005 and Nathaniel's trial in October 2005 became apparent the more I read. This was interesting because I hadn't seen the inconsistencies in this testimony explored in any of the legal appeals filed in Nathaniel's case.

13. It was also on this day that I first read an affidavit signed in 2012 by Tyran "Bubba" Cooper, which stuck out to me, because I know he was mentioned as a potential witness during Nathaniel's trial. Bubba was a drug dealer in Birmingham in 2004. His affidavit (on file at the courthouse) detailed payments that he made to Officer Carlos Owen and Officer Harley Chisholm (two of the victims) in exchange for not interfering in his illegal activity and for protection of his "drug house," known as the "Green Apartments" at 1619 18th Ave. N. Ensley in Birmingham. This is where the shooting took place. None of this information appeared in Nathaniel's trial record, which I found troubling. Nathaniel was convicted of capital murder based on evidence that he enticed the police officers to enter the apartment. If the police officers had their own motives to be at the Green Apartments that day and were not enticed there by Nathaniel, that would mean Nathaniel is innocent of capital murder.

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14. On February 12, 2020, I spoke by phone to Pamela Woods, Nathaniel's sister. Ms. Woods told me that she would convey my desire to assist with clemency to her brother and would obtain his consent to undertake clemency efforts on his behalf. Ms. Woods told me that she was in contact with certain witnesses in his case and would provide my phone number to them. She also told me that she would attempt to locate other witnesses that she was not currently in contact with, but who might provide useful information in support of clemency. She told me that it had been years since anyone representing her brother had reached out to her in connection with his case. She told me that Nathaniel was offered a plea deal of 20-25 years before going to trial and after Mr. Spencer had received a recommendation of Life Without Parole from the jury—which was overrode by the judge to impose death.

15. On February 12, 2020, I spoke by phone to Allen Smith, who was Bubba's colleague in illegal drug activities. I identified him as a potential witness to Nathaniel's case via Bubba's affidavit. Mr. Smith told me that he used to sell drugs out of the Green Apartments where the shooting took place. Mr. Smith had direct knowledge of Bubba's payments to Officers Owen and Chisholm. He told me that a "public defender" representing Nathaniel contacted him once to learn what he knew about the police officers who were killed and their activities at the Green Apartments. Mr. Smith told this attorney that Detective Russell called him by phone after the shooting at the Green Apartments. Detective Russell told Mr. Smith that, if he testified that Bubba was at the Green Apartments and involved in the shooting, then Detective Russell would give Mr. Smith all of the drugs and money that were recovered from the scene of the crime. Mr. Smith said that Nathaniel's attorney never contacted him again after this first meeting. Mr. Smith never heard from another one of Nathaniel's attorneys.

16. On February 14, 2020, I spoke by phone to Courtney Spencer, Kerry Spencer's brother. He did not testify at Nathaniel's trial. In my conversation with him, I learned that he was a witness to the interactions between Nathaniel and the police officers on the day of the shooting, and that he saw one of the officers with his gun drawn before

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he (the police officer) entered the Green Apartments. He told me that no one representing Nathaniel had ever contacted him to learn what he knew.

17. On February 15, 2020, I spoke by phone to Bubba, who confirmed the accuracy of the affidavit he provided to Mr. Spencer's counsel in 2012. I was amazed that this affidavit was never used in any of the appeals in Nathaniel's case to support his claims that he did not plan to entice any of the officers into the Green Apartments that day. Mr. Cooper provided additional details about how and when he paid officers Owen and Chisholm. He was never contacted by any attorney or investigator working on behalf of Nathaniel.

18. On February 16, 2020, I spoke by phone to Nathaniel Woods, Sr., Mr. Woods' father. Mr. Woods detailed extensive abuse that Nathaniel suffered at the hands of his mother growing up. He told me about once taking Nathaniel to the local police precinct to have the injuries inflicted by his mother's beatings photographed because they were so severe. Nathaniel's mother was arrested for the abuse but told the officers that Nathaniel had fallen out of the car. Nathaniel's father reported that, after this incident, Nathaniel was never the same and suffered from nervous habits like biting his fingers. My research and careful reading of the trial transcripts and post-conviction claims revealed that none of this information had been presented to any court.

19. Mr. Woods also told me that he ran into a Birmingham police officer at a dentist's office who told him that Mr. Woods needed to find an "Officer White" to uncover information that could lead to Nathaniel getting a new trial. Mr. Woods overheard this officer speaking in the dentist office about doing ministry work within prisons. Mr. Woods approached the officer to ask whether he had ever done prison ministry work at Holman Prison in Atmore, AL. The officer responded that no, he had not been there. Mr. Woods then told the officer that his son was in Holman Prison on death row and began to detail his case. This officer then responded that he was very familiar with the case. The officer told Mr. Woods that he could not tell him his name because he was about to retire and would lose his pension if he spoke out, but he told Mr. Woods to find "Officer White."

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20. According to Mr. Woods, the police officer he encountered at his dentist office told him that the police had been at the Green Apartments on the day of June 17, 2004 for a squad killing. Mr. Woods explained that a squad killing is when police officers go to a home with the intention of killing the occupants. To my knowledge, Mr. Woods was not able to follow up on this information.

21. On February 16, 2020, I again spoke by phone to Pamela Woods. Ms. Woods confirmed the story of repeated abuse that Mr. Woods had told me about Nathaniel's life growing up. She provided the additional details that their mother punished them by making them sleep in the car outside in the middle of winter. Ms. Woods further told me that she and her sister had to call the police to intervene in the episodes of abuse. Finally, Ms. Woods told me that the day after Nathaniel's father brought him to the police station, Nathaniel developed the nervous habit of chewing on his knuckles so much that the bone would show through. Ms. Woods told me that Nathaniel's school Parkview in Tuscaloosa, AL later observed this habit and sent him to therapy at Indian Rivers Mental Health Center, also in Tuscaloosa, AL. Ms. Woods also told me that J.D. Lloyd never spoke to her about Nathaniel's case other than when she emailed him for information, and neither he, nor any of Nathaniel's previous postconviction attorneys ever interviewed her or members of their family.

22. On February 16, 2020, I spoke by phone to Jackie Walters, the sister of Shantae Walters. Shantae Walters was the mother of Nathaniel's three children. Shantae Walters died of lung cancer on March 17, 2017. Jackie Walters told me that she accompanied her sister Shantae in February 2004 to withdraw charges related to a domestic disturbance that occurred at Shantae's home between Nathaniel and Shantae. Ms. Jackie Walters detailed that the domestic disturbance was related to destruction of property but not physical violence. A few days after this domestic disturbance event, Shantae decided that she did not want to pursue charges against Nathaniel. She asked Ms. Jackie Walters to accompany her to the Fairfield Police Department to drop all charges. The two went to the Fairfield Police Department, where Shantae signed a form indicating

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her desire to withdraw the warrant for his arrest. Ms. Jackie Walters states that the Fairfield Police Department gave a copy of this signed form to Shantae. Shantae's family was unable to locate this form in her belongings. Ms. Jackie Walters has expressed a willingness to sign an affidavit detailing the above facts. I also believe that Fairfield Police Department should have record of the signed document withdrawing these charges. It is my understanding that this is the warrant that the police stated they were attempting to serve on JD, and that discovery that it was no longer active would be critical information in his case. None of Nathaniel's attorneys ever reached out to Jackie or Shantae Walters for information prior to my contacting them.

23. On February 16, 2020, via Pamela Woods, I spoke by phone to Wanda Bryant, the Ensley Constable, who was a resident of the Ensley community at the time of the shooting. Ms. Bryant was not a direct witness to the shooting of June 17, 2004, but she and her sons had direct knowledge of Officer Owen and Officer Chisholm stealing and planting drugs on individuals from the community. Ms. Bryant's son, who wished to remain anonymous, briefly got on the phone during this call with some friends to detail their own interactions with these officers. One man reported that Officer Owen planted drugs on him, and that he went to prison as a result. Based on my review of the trial transcripts, none of these witnesses testified at Nathaniel's trial or were mentioned in later appeals.

24. On February 17, 2020, Pamela Woods told me that she had corresponded with Mr. Lloyd, Nathaniel's appointed attorney, in November 2019 about her concerns that there were no other plans for litigation in Nathaniel's case after the petition for certiorari was denied by the U.S. Supreme Court. She told me that her boyfriend again reached out to Mr. Lloyd on February 3, 2019, with information that a witness who testified at Nathaniel's trial—Marquita McClure—would be willing to speak with him. Mr. Lloyd never responded to this message. According to my conversations with Nathaniel's family members, Mr. Lloyd did not contact Nathaniel or his family after

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Nathaniel's execution date was set on January 30, 2020. He received notice of his execution date in a letter delivered to his cell by the Warden at Holman Prison.

25. On February 17, 2020, I again spoke by phone to Orrick attorney Marc Shapiro. Mr. Shapiro told me that his team was at maximum capacity in handling the § 1983 motion and that they would not be able to investigate the information I was discovering or bring other motions in this case.

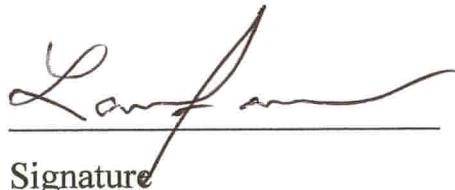
26. On February 19, 2020, I spoke by phone to Marquita McClure. Ms. McClure reported that she had been intimidated by the prosecution into lying on the stand. Specifically, she told me she untruthfully testified that she had observed Mr. Kerry Spencer and Nathaniel unloading weapons from the car into the Green Apartments on the morning of June 17, 2004. In truth she had not seen that that morning. None of Nathaniel's postconviction attorneys had ever contacted her about the case.

27. On February 20, 2020, I spoke by phone to JD Lloyd, Nathaniel's local attorney. Mr. Lloyd told me that he was first appointed to Nathaniel's case by a magistrate judge. This judge told Mr. Lloyd that he would only have to be on the case for a few weeks, and then the Federal Public Defender in Montgomery, AL would take over the case. Mr. Lloyd told me on this call that he believed he had been ineffective in representing Nathaniel. I asked Mr. Lloyd whether he would be comfortable with me bringing on additional outside counsel to support any filing efforts. Mr. Lloyd told me that he would be comfortable with finding another person to do this work. **Mr. Lloyd told me that he did not have any current plans to file any motions in connection with Nathaniel's case, despite the new evidence I was uncovering from witnesses who never spoke to an attorney for Nathaniel, and despite Nathaniel's clear wishes to continue challenging his conviction and sentence.**

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I hereby state that the information is true, to the best of my knowledge. I also confirm that the information here is both accurate and complete, and relevant information has not been omitted.



Signature

Lauren G. Faraino

Name (Printed)

March 3, 2020

Date

State of Alabama

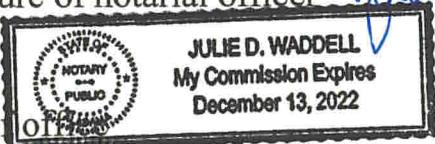
County of Jefferson

Signed and sworn to (or affirmed) before me on March 3, 2020 (date)

By Lauren G. Faraino (name(s) of individual(s) making statement.

Signature of notarial officer Julie D. Waddell

Stamp



Title of officer

My commission expires:

LAUREN E. FARAINO

LIMITED REPRESENTATION AGREEMENT

I am pleased to offer you limited legal representation on a pro bono basis. This Limited Representation Agreement explains your rights and obligations in our attorney-client relationship. Please read it carefully and keep a copy in a safe place.

This Limited Representation Agreement (hereafter, Agreement) is between **NATHANIEL L. WOODS** (hereafter, Client) and **LAUREN E. FARAINO**, the attorney (hereafter, Attorney).

Attorney will represent Client in the following matter(s) only:

1. investigative work in preparation of clemency petition;
2. drafting and editing of clemency petition; and
3. advocacy regarding clemency representation.

Specifically, litigation is not included in this Agreement. Attorney makes no guarantees with regard to the value or outcome of the case.

LEGAL SERVICES PROVIDED BY ATTORNEY

1. Client recognizes an attorney-client relationship exists between Client and Attorney.
2. Client recognizes that Attorney will not provide representation in any litigation and Attorney is not barred in the state of Alabama.
3. Client recognizes that Attorney will consult with the American Bar Association (ABA) Death Penalty Representation Project, and attorneys JD LLOYD, MARC SHAPIRO and SHANE MCCAMMON as necessary to further representation. Client consents to the disclosure of information to these parties to further Attorney's representation of Client.

ATTORNEY RESPONSIBILITIES

4. To keep Client informed about any important developments in his/her case.
5. To consult Client before taking any significant action or decision on his/her behalf.
6. To pursue the case with all reasonable diligence and maintain the confidentiality Client shares with Attorney.

ATTORNEY FEES

7. Client will not be charged for my attorney's services.
8. Attorney will attempt to have fees waived whenever possible, and in its sole discretion may choose to absorb any cost or expense.

COMMUNICATION

9. Attorney will keep the Client informed of developments in my matter(s) and consult with Client about how to respond to any offers. No settlement will be made without Client approval.

TERMINATION

10. Attorney may terminate services (subject to Court approval, if required), upon written notice to Client of the reasons for termination. Such reasons may include failure to cooperate with Attorney, misrepresentation to Attorney, the existence of a conflict of interest, if Client requests the attorney to engage in frivolous or unlawful actions, or if representation would not help achieve Client objectives.
11. Client may terminate the relationship with Attorney for any reason at any time. Client will provide Attorney notice of the termination in writing.
12. During your representation, a number of files may be created by Attorney. After the completion of your representation, upon your request, these files will be returned to you or forwarded to another attorney designated by you. Attorney files, including, for

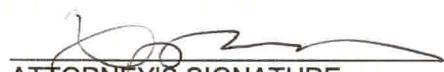
example, administrative records, time and expense reports and the like, will be retained by Attorney.

13. Upon termination of this representation, all documents containing confidences, secrets and/or privileged information shall be sealed.

I have read the Agreement, had an opportunity to ask any questions about the Agreement, and understand it to be the full Agreement for representation in this case.

Nathaniel Woods
CLIENT'S SIGNATURE

1/26/2020
DATE


ATTORNEY'S SIGNATURE

1/26/2020
DATE