

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA §
 §
v. § **Criminal No. 3:17-CR-103-M**
 §
BRADLEY J. HARRIS (01) §
 §

MOTION TO WITHDRAW AS COUNSEL

Walter L. Taylor, Counsel for Bradley J. Harris, submits this Motion to Withdraw, respectfully requesting the Court’s permission to withdraw from further representation of the Defendant in the above-styled and numbered cause. In support thereof, Counsel respectfully submits the following:

I. GROUNDS FOR THE MOTION

Counsel was retained to represent Mr. Harris in appellate proceedings before the Fifth Circuit, United States Supreme Court (if any), and subsequently in proceedings under 28 U.S.C. §2255 (if any). Counsel was engaged under a written fee contract for a flat fee, only 30% of which has been paid. Defendant quickly defaulted on Counsel’s fee and has no demonstrable ability to pay.

Despite Defendant’s default, Counsel in good faith out-earned the partially paid fee by researching numerous appellate points, writing a 40-page Brief in excess of 8,000 words, filing several motions and responses related to the appeal, advising Mr. Harris on strategic decisions and keeping him apprised of the status of the appeal. For the undersigned counsel, without further payment, to pursue an appeal to the United States Supreme Court (including advancing funds for the required, printed booklet & 40 copies), and to research and pursue future relief under 28 U.S.C. §2255 (or to research such relief and fully apprise Defendant of reasons not to do so) would work a financial hardship on the undersigned counsel.

II. CLIENT’S CONTACT INFORMATION

Although Mr. Harris’s appeal was dismissed by the Fifth Circuit, he has the right to appeal that dismissal to the United States Supreme Court, as well as the right to consider and file any 28 U.S.C. §2255 relief once his appeal has ended. Those decisions should be made with advice of counsel.

Upon information and belief, however, Mr. Harris is without funds to retain or secure representation to succeed the undersigned Counsel. Mr. Harris' contact information is therefore being provided in lieu of an attorney's contact, in accordance with Local Rule 57.12 of the Local Criminal Rules for the Northern District of Texas.

EXHIBIT 5

Mr. Harris' contact information is: Bradley J. Harris, Register Number: 55436-177, FMC Fort Worth, 3150 Horton Road, Fort Worth, TX 76119. The phone number for the FMC Fort Worth is 817-534-8400.

III. CONCLUSION AND PRAYER; REQUEST FOR APPOINTED COUNSEL

WHEREFORE, PREMISES CONSIDERED, Counsel respectfully requests this Court to allow Counsel to withdraw as an attorney of record and issue an order for Counsel to be relieved from any further representation of the Defendant and/or any additional obligations in the above-styled and numbered cause, and that the Court provide Defendant with appointed counsel for the consideration of an appeal to the United States Supreme Court.

Respectfully submitted,

/s/ Walter L. Taylor

Walter L. Taylor
State Bar No. 19727030
taylorlawfirmfw@gmail.com
TAYLOR LAW FIRM
6630 Colleyville Blvd, Suite 100
Colleyville, Texas 76034
Tel: (817) 770-4343
Fax: (682) 292-7406
**ATTORNEY OF RECORD FOR
DEFENDANT-APPELLANT**

CERTIFICATE OF SERVICE

I hereby certify by my signature above that a true and correct copy of the foregoing document has this day been served via CM/ECF electronic service, upon the following on this 15th day of December, 2022:

CHAD E. MEACHAM
UNITED STATES ATTORNEY
Dimitri N. Rocha
Assistant United States Attorney
Florida Bar No. 11987
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
T: 214-659-8600 | F: 214-659-8805
dimitri.rocha@usdoj.gov

