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Attorney for NORALEE GONZALEZ-ACOSTA

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

UNITED STATES OF AMERICA,)
Plaintiff,)
v.)
NORALEE GONZALEZ-ACOSTA,)
Defendant.)

CASE NO. 4:07-CR-00241-CKJ(JCG)
**SUPPLEMENTAL MOTION TO
WITHDRAW AS COUNSEL**

It is expected that excludable delay under Title 18, United States Code, §3161(h)(1)(J) will occur as a result of this motion or an order based thereon.

Natman Schaye, counsel of record for Noralee Gonzalez-Acosta, pursuant to Local Rule of Civil Procedure 83.3, as incorporated to criminal cases by Local Rule of Criminal Procedure 57.14, submits this supplemental motion for an order permitting him to withdraw from further representation in this matter. (*See* Doc. 53). This motion is based on the certification filed in support of his Motion to Withdraw as Counsel (Doc. 53), as well as the accompanying certification.

RESPECTFULLY SUBMITTED this twentieth day of June 2007.

s/Natman Schaye
NATMAN SCHAYE
Counsel for Defendant
NORALEE GONZALEZ-ACOSTA

CERTIFICATION

Natman Schaye certifies as follows:

1. I am counsel of record for Noralee Gonzalez-Acosta in the above-captioned matter.
2. After filing the Motion for Sealed, *Ex Parte* Hearing re Issue of Defense Counsel (Doc. 61) earlier this date, I spoke with Assistant United States Attorney Jerry Albert, the prosecutor assigned to this matter. Mr. Albert stated that he understood my Motion to Withdraw (doc. 53) to be based solely on my inability to contact Ms. Gonzalez-Acosta. In fact, there are additional grounds which I apparently failed to assert in a sufficiently explicit manner in that motion. I believe that it would be inappropriate, unethical and prejudicial for me to describe those grounds in open court. I therefore requested the sealed, *ex parte* hearing.
3. I therefore file this supplement and renew my Motion to Withdraw. I further request that I be allowed to provide additional information in this regard in a sealed, *ex parte* hearing.
4. I will provide Ms. Gonzalez-Acosta with a copy of this pleading later today.
5. It is therefore respectfully submitted that good cause exists for my withdrawal and I request that this Court so order.

RESPECTFULLY SUBMITTED this twentieth day of June 2007.

s/Natman Schaye
NATMAN SCHAYE
Counsel for Defendant
NORALEE GONZALEZ-ACOSTA

1 CERTIFICATE OF SERVICE

2 I hereby certify that on June 20, 2007, I electronically transmitted the attached
3 document to the Clerk's Office using the ECF System for filing and transmittal of a
4 Notice of Electronic Filing to the following ECF registrant:

5 Jerry R. Albert
6 Office of the United States Attorney
7 405 West Congress Street, Suite 4800
8 Tucson, Arizona 85701-5040

9 Jose M. Lerma
10 Lerma & Associates, P.C.
11 33 North Tucson Boulevard
12 Tucson, Arizona 85716

13 s/Sharon Hardin

14 I hereby certify that on June 20, 2007, I hand-delivered the attached document to
15 the following individual, who is not an ECF registrant:

16 Noralee Gonzalez-Acosta
17 Post Office Box 1118
18 Douglas, Arizona 85607

19 By s/Natman Schaye