Case 1:16-cv-06848-BMC Document 442 Filed 01/11/19 Page 1 of 1 PageID #: 10972

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION

v.

Case No. 1:16-cv-06848-BMC

JOSEPH MANN, et al.,

Defendants.

MOTION FOR WITHDRAWAL OF APPEARANCE

PLEASE TAKE NOTICE that upon the accompanying declaration of Ashley C. Burns,

dated January 11, 2019, Ashley C. Burns hereby moves to withdraw as counsel of record for

Defendant Joseph Mann in the above-referenced matter, pursuant to Local Civil Rule 1.4.

Jonathan S. Sack and Benjamin S. Fischer of the law firm of Morvillo Abramowitz Grand

Iason & Anello P.C. will remain as counsel of record to Mr. Mann.

Dated: New York, New York January 11, 2019

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

By: <u>s/ Ashley C. Burns</u> Ashley C. Burns

565 Fifth Avenue New York, New York 10017 (212) 856-9600 (phone) (212) 856-9494 (fax) aburns@maglaw.com

SO ORDERED. January ____, 2019

> The Honorable Brian M. Cogan United States District Judge

Case 1:16-cv-06848-BMC Document 442-1 Filed 01/11/19 Page 1 of 2 PageID #: 10973

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION

v.

Case No. 1:16-cv-06848-BMC

JOSEPH MANN, et al.,

Defendants.

DECLARATION IN SUPPORT OF MOTION FOR WITHDRAWAL

I, Ashley C. Burns, declare as follows, pursuant to 28 U.S.C. § 1746:

1. Pursuant to Local Civil Rule 1.4, I respectfully request leave of the Court to

withdraw my appearance as counsel for Defendant Joseph Mann in the above-captioned action.

2. As of January 11, 2019, I will no longer be associated with Morvillo Abramowitz Grand Iason & Anello P.C.

3. Jonathan S. Sack and Benjamin S. Fischer of the law firm of Morvillo

Abramowitz Grand Iason & Anello P.C. will remain as counsel of record to Mr. Mann.

4. Because the motion herein will not result in a change of the law firm representing Mr. Mann, I respectfully submit that my withdrawal as counsel of record will not affect this action in any way, will not alter the posture of the case, and will not prejudice any parties.

5. For the foregoing reasons, I hereby request that I be removed as counsel of record from the Electronic Case Filing system, and that no documents, notices, or other pleadings in the action be served upon me.

1

6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 11, 2019 New York, New York

ASHLEY C. BURNS