

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

CARTER PAGE,

Plaintiff,

v.

U.S. DEPARTMENT OF JUSTICE,

Defendant.

Case No. 1:19-CV-03149-KBJ

MOTION TO WITHDRAW

Pursuant to LCvR 83.6(c), Thomas M. Buchanan, counsel for plaintiff Carter Page, respectfully requests to withdraw as counsel in this case.

1. Plaintiff, then self-represented, filed this action on October 21, 2019. ECF 1. The government filed its Partial Motion to Dismiss and for Partial Summary Judgment (ECF 9, “Motion”) on December 23, 2019.

2. On January 31, 2020, Dr. Page requested an extension of time to respond to the Motion. ECF 11. By Order of February 4, 2020, the Court extended the time for Dr. Page to respond to March 31, 2020. Dr. Page engaged me as counsel and I entered my notice of appearance on March 25, 2020. ECF 12.

3. In light of settlement discussions and other factors, including COVID-19, Dr. Page requested two additional extensions to respond to the government’s Motion, most recently to July 29, 2020; the Court granted those motions. *See* ECF 13 and ECF 14.

4. In a joint status report dated July 15, 2020 (ECF 15), Dr. Page and the government informed the Court that the parties made good faith efforts to resolve this case over several months, but were unsuccessful.

5. In late July, Dr. Page retained new counsel to handle this case. In light of his change of counsel, Dr. Page requested an extension of time to respond to the government's Motion to September 11, 2020, which the Court granted. ECF 16.

6. Dr. Page represents that he has not yet been able to obtain local counsel as had originally been expected. Neither of the attorneys whom he has been working with is licensed to practice in the District of Columbia.

7. Dr. Page has indicated his consent to this motion by his signature, below. Pursuant to LCvR 83.6(c), I have informed Dr. Page that he must obtain other counsel, admitted to practice before this Court, or notify the Clerk in writing within seven days if he intends to conduct the case pro se or to object to the withdrawal.

WHEREFORE, Thomas Buchanan, counsel for Dr. Page, respectfully requests that the Court grant his motion to withdraw.

Dated: August 11, 2020

Respectfully submitted,



Carter Page, Ph.D.
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Plaintiff

/s/ Thomas M. Buchanan
Thomas M. Buchanan (D.C. Bar # 337907)
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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on August 11, 2020, the foregoing motion was electronically filed and served on the Plaintiff and all counsel of record through the Court's CM/ECF system, in accordance with the Court's electronic case filing policies and procedures. Pursuant to LCvR 83.6(c), the foregoing motion was served upon Dr. Page, along with a notice advising Dr. Page to obtain other counsel, or, if he intends to conduct the case *pro se* or to object to the withdrawal, to so notify the Clerk in writing within seven days of service of the motion:

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Email: cpage@globalenergycap.com

/s/ Thomas M. Buchanan
Thomas M. Buchanan
Counsel for Plaintiff