

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

CHARLOTTE CHARLES, *et al.*,

Plaintiffs,

vs.

ANNE SACOOLAS, *et al.*,

Defendants.

Case No.: 1:20-cv-1052

**MEMORANDUM IN SUPPORT OF COHEN MILSTEIN SELLERS & TOLL PLLC'S  
MOTION FOR LEAVE TO WITHDRAW AS COUNSEL FOR PLAINTIFFS**

Cohen Milstein Sellers & Toll PLLC respectfully submits this Memorandum in support of its Motion to withdraw as counsel for the Plaintiffs in this action. Given the sensitivities of this matter, we limit our statement here to simply say irreconcilable differences and professional considerations have arisen that require termination of the representation and that Plaintiffs need retain new counsel. Situations have arisen which makes continued representation untenable and unworkable. We have brought this matter to the Court's attention at the earliest possible time after it became apparent the relationship cannot continue.

We have given Plaintiffs advance notice that this motion would be filed. We will email them this Motion and Memorandum in Support. They are endeavoring to retain another law firm. We are prepared to submit in camera a declaration(s) in support of this motion to assist the Court in understanding what has happened should the Court wish to proceed in this manner.

We ask for expedited consideration of this motion as there is a discovery deadline of July 23, 2021. Pursuant to the paragraph 10(g) of the Court's Rule 16(d) scheduling order, we have noticed a hearing next Friday, May 14, but given the discovery deadline, and the sensitivity of the issues, we request that the Court consider scheduling an earlier in camera hearing or call.

Cohen Milstein commits to cooperating with the new counsel concerning the transfer of the case files to help them continue on in the case and get the best results possible for the Plaintiffs. We would hope that new counsel can be retained in the very near future so that our withdrawal may be effectuated.

Dated: May 4, 2021

By: /s/ Steven J. Toll

Steven J. Toll, VSB #15300

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 4, 2021, I electronically filed the *Memorandum in Support of Cohen Milstein Sellers & Toll PLLC's Motion for Leave to Withdraw as Counsel for Plaintiffs* with the Clerk of the Court using the ECF and that I sent the same to Plaintiffs via electronic mail.

Dated: May 4, 2021

/s/ Steven J. Toll  
Steven J. Toll