

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA)
) No. 16 CR 64-1
 v.)
)
RONALD VAN DEN HEUVEL) Chief Judge William C. Griesbach
)

MOTION TO WITHDRAW AS COUNSEL

Now comes Nancy DePodesta, Arnstein & Lehr LLP, counsel for defendant Ronald H. Van Den Heuvel, and respectfully requests this Court for leave to withdraw as counsel in the above-captioned matter. In support thereof, the undersigned states as follows:

1. On April 19, 2016, the Grand Jury returned a multiple-count indictment against defendant charging him with a conspiracy to defraud Horicon Bank, in violation of Title 18, United States Code, Section 371; bank fraud, in violation of Title 18, United States Code, Sections 2 and 1344, and making false statements to a bank for the purpose of influencing its action to provide a loan, in violation of Title 18, United States Code, Sections 2 and 1014.

2. On May 13, 2016, the undersigned filed an attorney appearance in the above-captioned case. The case is still in its preliminary stages in that discovery is still ongoing, pretrial motions have not yet been filed, and a firm trial date has not been scheduled. The case is currently set for a status hearing on June 30, 2016.

3. Due to ongoing investigations involving defendant and his companies, potential conflict issues have arisen. In light of the potential conflicts, Mr. Van Den Heuvel and counsel agree that it is appropriate for Mr. Van Den Heuvel to be represented by other counsel in the above-referenced matter. Mr. Van Den Heuvel advised the undersigned that

he has spoken to other counsel regarding their representation of him in this and other matters.

4. A copy of the Notice of Motion and this Motion to Withdraw as Counsel has been sent electronically and by certified mail to defendant. Defendant has also been advised of the status hearing scheduled for June 30, 2016.

Accordingly, counsel respectfully requests that this Court will grant the undersigned's Motion to Withdraw as Counsel in the above entitled matter.

Respectfully submitted,

ARNSTEIN & LEHR LLP

/s/ Nancy DePodesta
Nancy DePodesta

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