

IN THE COURT OF COMMON PLEAS OF MONTGOMERY COUNTY,  
PENNSYLVANIA - CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA, : NO. CP-46-CR-0003932-2016  
: :  
v. : :  
WILLIAM H. COSBY, JR. : :

MOTION TO WITHDRAW ADMISSION AS COUNSEL PRO HAC VICE

TO THE HONORABLE STEVEN T. O'NEILL, COURT OF COMMON PLEAS OF  
MONTGOMERY COUNTY:

Petitioners hereby move this Honorable Court to permit withdrawal of admission as counsel pro hac vice pursuant to Pa.R. Crim.P.Rule 120(B), and in support thereof, aver as follows:

1. Petitioners were privately retained to represent the above-captioned defendant in connection with criminal charges in the above-captioned matter. This Court entered Orders granting admission *pro hac vice* to petitioner Angela C. Agrusa, Esq. on October 5, 2016; to petitioners Delilah G. Vinzon, Esq. and Ryan D. Austin, Esq. on June 2, 2017. Brian J. McMonagle is referenced as the sponsor for each of the three petitioners pursuant to the Verification of Brian J. McMonagle, Esq. in Support Of Motion for Admission *Pro Hac Vice*, filed concurrently with each petitioner's Motion for Admission *Pro Hac Vice*.

2. The case proceeded to a jury trial which resulted in a hung jury, and a mistrial was declared. Petitioners seek the Court's permission to withdraw as counsel at this time.

3. On August 1, 2017, Brian J. McMonagle, Esq. filed a Motion to Withdraw as Counsel, which remains pending before the Court. In his Motion, Mr. McMonagle indicated that Defendant sought until August 21, 2017 to retain new counsel. On August 1, 2017, the Court

2017 AUG 15 AM 11:19

CLERK OF COURTS  
OFFICE  
MONTGOMERY COUNTY  
PENNA.

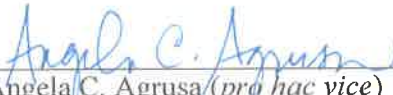
entered an Order scheduling a Pre-Trial Conference for August 22, 2017 to address outstanding issues, including Mr. McMonagle's Motion to Withdraw as Counsel.


4. Defendant continues to take necessary steps to secure new counsel. However, given factors outside of Defendant's control, including but not limited to the availability of prospective counsel due to summer schedules and existing trial schedules and the import and particularities of this high-profile and sensationalized matter, Defendant requires brief additional time in order to finally secure his representation. Defendant requests that he be given until **September 11, 2017** to retain new counsel, and requests that the Pre-Trial Conference scheduled for August 22, 2017 be continued to a date on or after **September 11, 2017**.

**WHEREFORE**, Petitioners pray this Honorable Court to permit their withdrawal of counsel.

Dated: August 14, 2017

Respectfully submitted,

By:   
\_\_\_\_\_  
Angela C. Agrusa (*pro hac vice*)  
LINER LLP  
1100 Glendon Avenue, 14<sup>th</sup> Floor  
Los Angeles, CA 90024  
Tel: (310) 500-3500; Fax: (310) 500-3501

By:   
\_\_\_\_\_  
Delilah G. Vinzon (*pro hac vice*)  
LINER LLP  
1100 Glendon Avenue, 14<sup>th</sup> Floor  
Los Angeles, CA 90024  
Tel: (310) 500-3500; Fax: (310) 500-3501

By 

Ryan D. Austin (*pro hac vice*)

LINER LLP

1100 Glendon Avenue, 14<sup>th</sup> Floor

Los Angeles, CA 90024

Tel: (310) 500-3500; Fax: (310) 500-3501

**VERIFICATION**

ANGELA C. AGRUSA, ESQUIRE, verifies that the statements made in the foregoing MOTION TO WITHDRAW AS COUNSEL are true and correct and understands that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsification to authorities.

Dated: August 14, 2017

  
\_\_\_\_\_  
ANGELA C. AGRUSA, ESQ.

**VERIFICATION**

DELILAH G VINZON, ESQUIRE, verifies that the statements made in the foregoing MOTION TO WITHDRAW AS COUNSEL are true and correct and understands that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsification to authorities.

Dated: August \_\_\_\_, 2017



---

DELILAH G. VINZON, ESQ.

**VERIFICATION**

RYAN D. AUSTIN, ESQUIRE, verifies that the statements made in the foregoing MOTION TO WITHDRAW AS COUNSEL are true and correct and understands that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsification to authorities.

Dated: August \_\_, 2017

  
\_\_\_\_\_  
RYAN D. AUSTIN, ESQ.

**CERTIFICATE OF SERVICE**

ANGELA C. AGRUSA, ESQUIRE, hereby certifies that a true and correct copy of the  
within document has been served by first class United States mail upon:

KEVIN STEELE, DISTRICT ATTORNEY  
MONTGOMERY COUNTY  
DISTRICT ATTORNEYS OFFICE

Dated: August 14, 2017

  
\_\_\_\_\_  
ANGELA C. AGRUSA, ESQ.