

STATE OF MAINE  
YORK COUNTY, ss.

STATE OF MAINE  
Cumberland, SS. Clerk's Office

SUPERIOR COURT  
CRIMINAL ACTION  
DOCKET NO. CR-12-2049

JAN 15 2013

RECEIVED

STATE OF MAINE	)	
	)	
v.	)	MOTION TO WITHDRAW,
	)	PURSUANT TO M.R. CRIM. P. 44B
MARK W. STRONG	)	

Counsel for Defendant Mark W. Strong, Daniel G. Lilley, Esq., and Tina Heather Nadeau, Esq., hereby move for this Honorable Court to grant their motion to withdraw from representation of Defendant Strong in this matter.

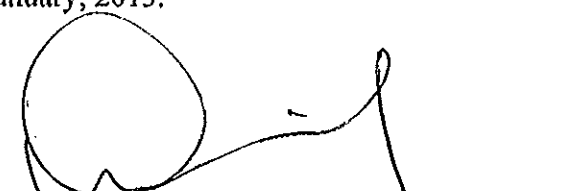
1. Circumstances have arisen that have made it impossible for Counsel to continue to represent Defendant Strong.
2. Defendant Strong's financial situation denies him the ability to pay for counsel fees for representation at three-week trial for this 59-count criminal case against him.
3. Defendant Strong's financial situation also denies him the ability to retain computer experts and a private investigator's services, which are necessary to the mounting of his defense.
4. Defendant Strong received notice that his assets were ordered attached in a separate civil action on January 9, 2013, and thereby does not have access to any money.
5. Defendant Strong's Motion to Continue this case to February 19, 2013, or later was denied by Order of the Court today, January 15, 2013, which has closed the time he has to gather any funds in support of his defense.
6. It is impossible for Defendant Strong to gather the resources necessary to fund his defense by January 22, 2013.

7. Lead counsel for Defendant Strong, additionally, is having invasive surgery this week, which further cuts down on the time and resources Counsel can devote towards preparing for this three-week intensive trial.

8. Defendant Strong assents to this Motion to Withdraw and is aware that he can represent himself *pro se*.

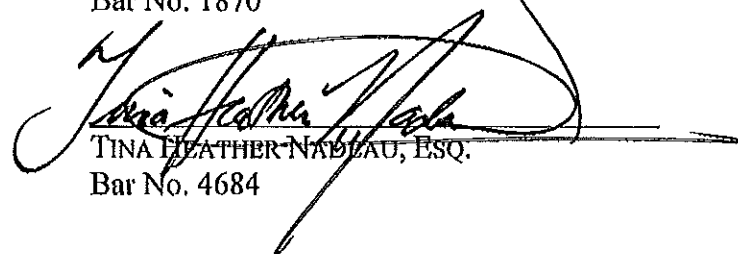
9. Defendant Strong and Defense Counsel respectfully request a hearing on this Motion on Friday, January 18, 2013.

Dated in Portland, Maine, this 15th day of January, 2013.



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DANIEL G. LILLEY, ESQ.  
Bar No. 1870



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TINA HEATHER NABLAU, ESQ.  
Bar No. 4684

Attorneys for Defendant  
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