

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

Case No. 23-cr-20701

v.

HON. STEPHEN J. MURPHY

Conrad Rockenhaus,

Defendant.

Defense Counsel's Motion to Withdraw as Counsel

Defense counsel, Marc R. Lakin, moves this Honorable Court to allow him to withdraw from representing Defendant Conrad Rockenhaus, under the Michigan Rules of Professional Conduct, E.D. Mich. LCrR 57.1(a), E.D. Mich. LR 83.22(b), and E.D. Mich. LR 83.25(b)(2), and to appoint substitute counsel.

Respectfully submitted,

/s/ Marc R. Lakin

MARC R. LAKIN (P41147)

Lakin Law, PLLC

Attorney for Defendant

210 S. Old Woodward, Ste. 220

Birmingham, MI 48009-3636

(248) 723-1199

marclakin@mac.com

Dated: OCTOBER 2, 2025

**Brief in Support of
Defense Counsel's Motion to Withdraw as Counsel**

Defendant Rockenhaus retained attorney Marc Lakin for representation in this supervised release case, and defense counsel entered his appearance on March 6, 2025. (ECF No. 6).

Defense counsel appeared at the initial hearing on March 6, 2025, and obtained a bond with conditions for Rockenhaus until the violation hearing. Defense counsel also appeared for the May 13, 2025 violation hearing where Rockenhaus admitted guilt for violating the conditions of his supervised release, and sentencing was scheduled for September 30, 2025. Sentencing has been adjourned to October 7, 2025.

After the May 13, 2025 violation hearing, there was a breakdown of the attorney-client relationship:

1. While defense counsel was on vacation out of the country, Rockenhaus began making demands for defense counsel to withdraw;
2. Rockenhaus also demanded that defense counsel cease all contact or communication with him;
3. On August 21, 2025 and August 27, 2025, Rockenhaus filed two *pro se* motions asking for the appointment of counsel and defense counsel's removal (ECF No. 14 and 15), both were stricken;

4. Rockenhaus also created a website accusing defense counsel of various misconduct, which defense counsel denies (<https://rockenhaus.com/the-role-of-attorney-marc-r-lakin-p41147-in-a-constitutional-crisis/>; last accessed on September 24, 2025); and,
5. Rockenhaus has filed a formal grievance against defense counsel with the Michigan Attorney Grievance Commission. *Id.*

“The Rules of Professional Conduct adopted by the Michigan Supreme Court ... apply to members of the bar of this court and attorneys who practice in this court” E.D. Mich. LR 83.22(b). The relevant part of the Michigan Rules of Professional Conduct, MRPC 1.16 “Declining or Terminating Representation,” sets forth the following:

(b) [A] lawyer may withdraw from representing a client if withdrawal can be accomplished without material adverse effect on the interests of the client, or if:

* * *

(3) the client insists upon pursuing an objective that the lawyer considers ... imprudent;

* * *

(5) the representation ... has been rendered unreasonably difficult by the client; or

(6) other good cause for withdrawal exists.

[MRPC 1.16(b)(3), (5)–(6).]

Defendant Rockenhaus's legal interests will not be adversely affected by counsel's withdrawal. Also, withdrawal will not "unduly delay trial of the case, or be unfairly prejudicial to any party, or otherwise not be in the interest of justice." E.D. Mich. LCrR 57.1(d).

Counsel has notified has served Rockenhaus a copy of this Motion as described in the attached Certificate of Service and in compliance with E.D. Mich. LCrR 57.1(d).

WHEREFORE, Defense counsel moves this Honorable Court to grant this Motion and order the immediate withdrawal of attorney Marc R. Lakin from the representation of Defendant Conrad Rockehaus and to appoint new counsel for Defendant.

Respectfully submitted,

/s/ *Marc R. Lakin*

MARC R. LAKIN (P41147)

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Attorney for Defendant

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Dated: OCTOBER 2, 2025

Certificate of Service

I certify that on OCTOBER 2, 2025, the above Motion was filed with the Clerk of the Court using the CM/ECF system, which served the document(s) to the parties of record.

I further certify that on OCTOBER 2, 2025, I mailed a copy of the above Motion to Defendant Conrad Rockenhaus at MILAN DETENTION FACILITY, P.O. BOX 1000, MILAN MICHIGAN 48160.

/s/ Marc R. Lakin
MARC R. LAKIN (P41147)
Attorney for Defendant