

VIRGINIA:
IN THE COURT OF APPEALS OF VIRGINIA

BRIAN DAVID HILL,
Petitioner,

v.

RECORD NO.: 1295-20-3

CITY OF MARTINSVILLE,
Appellee.

MOTION TO WITHDRAW AS COUNSEL OF RECORD

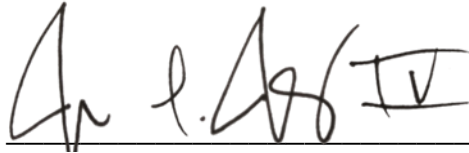
Comes now John I. Jones, IV, Esq. counsel for Brian David Hill, the appellant, and moves the Court to allow counsel to withdraw as counsel of record.

The Circuit Court for the City of Martinsville appointed counsel to represent Hill in this matter and in the related appeal in Record No. 1294-20-3.

Counsel has discussed with Hill that it is counsel's legal opinion that an appeal would not be meritorious. The appeal was preserved by counsel. Counsel has reviewed the record and the transcript and has prepared a Petition for Appeal referring to all that he can find supporting the argument that the trial court should have granted Hill's motion for reconsideration. Counsel does not believe that he can in good faith assert any further claims in the client's appeal. *Anders v. California*, 386 U.S. 738 (1967); *Kuzminski v. Commonwealth*, 8 Va. App 106, 378 S.E.2d 632 (1989).

WHEREFORE, counsel respectfully requests that this Court relieve him as counsel of record.

Respectfully submitted this 13th day of April, 2021.



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CERTIFICATE

I hereby certify that on April 13, 2021, I have emailed a copy of the foregoing motion to G. Andrew Hall, Commonwealth’s Attorney, Office of the Commonwealth’s Attorney of Chesterfield County, counsel for the appellee, at ahall@ci.martinsville.va.us. On the same date, I am emailing a copy of the foregoing motion, along with copies of the motion for an extension and the petition for appeal filed this day in the same case, to Brian David Hill, c/o Roberta Hill, at rbhill67@comcast.net.



John I. Jones, IV, Esq.