

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

*Plaintiff,*

v.

MILLER'S ORGANIC FARM and

AMOS MILLER,

*Defendants.*

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CIVIL ACTION

NO. 19-cv-1435

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MOTION TO WITHDRAW AS COUNSEL

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TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES STEVEN LAFUENTE, ESQ. of The Lafuente Firm, PLLC, and brings this Motion to Withdraw as Counsel pursuant to Local Civil Rule 5.1(c) and in support thereof shows:

1. Amos Miller and Miller's Organic Farm retained Movant to represent them in the matter before this court.
2. Good cause exists for withdrawal as counsel.
3. On October 1, 2021, Movant received a letter dated September 29, 2021, from Prairie Star National advising Movant that his representation of Amos Miller and Miller's Organic Farm is terminated. *See Exhibit A.*
4. Movant contacted Prairie Star National and asked to speak with the attorney who will be filing the Motion to Substitute Counsel. At that time, Movant suspected that the advocacy group does not include licensed counsel.
5. On October 4, 2021, Movant received a facsimile from Amos Miller advising him

that he and the farm will now be represented by National Star Prairie and that Movant will no longer represent the defendants. *See* Exhibit B.

6. The most pressing issue between the parties at this point is finding a neutral third party who is qualified to conduct an inventory before defendants are permitted to begin liquidating arrested products. FSIS has not approved of any candidates suggested by defendants and after numerous attempts Movant has been able to find a qualified person or entity that can conduct the inventory with less than six-weeks' notice.

7. Defendants are utterly anxious to begin liquidating arrested products and to begin providing products to their members for the November Wedding Season. Therefore, defendants have grown entirely impatient with Movant's inability to get a qualified candidate to conduct the inventory.

8. Movant has experience with advocacy groups like Prairie Star National and Movant suspects that defendants have chosen to pursue a strategy with which Movant has no desire to associate.

9. Movant's representation of the defendants is further complicated at this juncture by the fact that Movant resides and practices primarily in Dallas, Texas. Movant believes that the defendants will be better served with local counsel.

10. This withdrawal is not sought for delay, but rather that the defendants may seek counsel of their own choice.

#### **PRAYER**

WHEREFORE, PREMISES CONSIDERED, Movant prays that the Court will grant his motion to withdraw so that defendants may seek local counsel, and for such other relief the court

deems just and right.

Respectfully submitted,

THE LAFUENTE FIRM, PLLC

/s/ Steven Lafuente, Esq.  
Steven Lafuente, Esq.  
State Bar No. 24032522  
Santander Tower  
1601 Elm Street, Floor 33  
Dallas, Texas 75201  
(214) 886-6864 (Office)  
(888) 824-4248 (Facsimile)  
[lafuentelaw@gmail.com](mailto:lafuentelaw@gmail.com)

**ATTORNEY FOR DEFENDANT**

AGREED:

/s/ Amos Miller  
Amos Miller

**CERTIFICATE OF SERVICE**

By my signature, I, the undersigned attorney, attest that a true and correct copy of the foregoing was served the United States Attorney's Office according to the Federal Rules of Civil Procedure on Thursday, October 21, 2021.

/s/ Steven Lafuente, Esq.  
Steven Lafuente, Esq.

# EXHIBIT A



3965 Bethel Road SE  
Suite 1, PMB #1-244  
Port Orchard, Washington  
Postal Code 98366

[psn@prairiestar.net](mailto:psn@prairiestar.net)

**LAW ADVOCATE**

September 29, 2021

Steve Lafuente  
Thanksgiving Tower  
1602 Elm Street  
Dallas, TX 75201

1. This letter is to inform you of the following facts:

- a. AMOS MILLER, the MUNICIPAL FEDERAL NAME, and MILLER'S ORGANIC FARM, a Pennsylvania Business Entity (unincorporated Association), has chosen to terminate your services effective immediately. We do acknowledge that this termination will be confirmed by Amos Miller, private American national-citizen.
- b. We request that you notify the appropriate Plaintiffs of your termination of counsel and that all future correspondence or demands be directed to Prairie Star National.
- c. That any and all documents relating to this case be provided to Amos Miller, or directly to Prairie Star National to the above address.

2. This notice is effective on this 29<sup>th</sup> day of September 2021.

Respectfully

**Prairie Star National ©**

By: K. Allan Goulet - Agent - Trustee  
Without Prejudice – All Right Reserved

cc: Amos Miller, Private  
MILLER'S ORGANIC FARM

## EXHIBIT B

Hello Steve

Did you receive documents  
From National Star Praise

That they will now be  
representing us please confirm

Then please notify USDA

that you will not represent our  
farm at this time

also Did you find someone  
to do the inventory if you did  
Please forward the contact info at this  
time

and where do we stand

with the meat that is on Arrest  
What is the next step with that  
let me know ASAP Thanks  
Amor