

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NO. 12-034123 (07)

PHILIP J. VON KAHLE, as Conservator of
P&S Associates General Partnership and
S&P Associates, General Partnership, et al.

Complex Litigation Unit

Plaintiffs,

vs.

MICHAEL D. SULLIVAN, et al.,

Defendants.

MOTION TO WITHDRAW AS COUNSEL

The undersigned attorneys Mark F. Raymond, P.A., Jonathan Etra, P.A., and Shane P. Martin, Esq., all of the law firm of Broad and Cassel, pursuant to Fla.R.Jud.Admin 2.505(f)(1), hereby move the Court for an Order permitting their withdrawal as attorneys in this action on behalf of Defendant Michael Bienes. In support of this motion, the undersigned state:

1. It is Mr. Bienes's wish that the undersigned withdraw from this action as his counsel and that they be relieved of any further responsibility for his representation in this action, effective immediately.

2. To that end, Mr. Bienes is executing a Consent to Withdrawal of Counsel, in which he manifests his consent to the undersigned's withdrawal and to their being relieved from any further responsibility for his defense. A copy of the signed Consent will be filed with the Court once completed.

3. Mr. Bienes requests that he be given seven (7) days from the date of the Order on this motion to secure new counsel or proceed *pro se*.

BROAD and CASSEL

One Biscayne Tower, 21st Floor, 2 South Biscayne Blvd., Miami, Florida 33131 305.373.9400

4. Mr. Bienes's mailing and e-mail address for all future pleadings and papers served or filed in this matter is:

Michael Bienes
3200 Port Royale Drive North
Apt 1003
Fort Lauderdale, Florida 33308
michaelbienes@aol.com

5. No party to this action will be prejudiced by the relief sought in this motion.

WHEREFORE, the undersigned respectfully request that this Court grant this motion and enter an Order granting the relief requested in this motion.

Dated this 1st day of March, 2016.

Respectfully submitted,

/s/ Shane P. Martin

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Counsel for Defendant, Michael Bienes

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 1, 2016, the foregoing document was served via E-mail to: Thomas E. Messina, Esq., Thomas Zeichman, Messina, P.A., 401 East Las Olas Boulevard, Suite 1400, Ft. Lauderdale, FL 33301 (tmessana@messana-law.com, tmessana@bellsouth.net, mwslawfirm@gmail.com, tzeichman@messana-law.com); Leonard K. Samuels, Esq., Etan Mar, Esq., Steven D. Weber, Esq., Berger Singerman LLP, 350 East Las Olas Boulevard, Suite 1000, Ft. Lauderdale, FL 33301 (lsamuels@bergersingerman.com, vleon@bergersingerman.com, emark@bergersingerman.com, lyun@bergersingerman.com, drt@bergersingerman.com, sweber@bergersingerman.com, mvega@bergersingerman.com, zhyman@bergersingerman.com, clamb@bergersingerman.com); Peter G. Herman, Esq., Tripp Scott, 110 S.E. 6th Street, 15th Floor, Ft. Lauderdale, FL 33301 (pgh@trippscott.com, rep@trippscott.com, ele@trippscott.com); Paul V. DeBianchi, Esq., Paul V. DeBianchi, P.A., 111 S.E. 12th Street, Ft. Lauderdale, FL 33316 (Debianchi236@bellsouth.net); Gary A. Woodfield, Esq., Susan B. Yoffee, Esq., Haile, Shaw & Pfaffenberger, P.A., 660 U.S. Highway One, Third Floor, North Palm Beach, FL 33408 (gwoodfield@haileshaw.com, bpetroni@haileshaw.com, eservices@haileshaw.com, syoffee@haileshaw.com, cmarino@haileshaw.com); Matthew Triggs, Esq., Andrew Thomson, Esq., Proskauer Rose LLP, 2255 Glades Road, Suite 421 Atrium, Boca Raton, FL 33431 (mtriggs@proskauer.com, athomson@proskauer.com, florida.litigation@proskauer.com); Robert J. Hunt, Esq., Debra D. Klingsberg, Esq., Hunt & Gross, P.A., 185 Spanish River Boulevard, Suite 220, Boca Raton, FL 33431 (bohunt@huntgross.com, eservice@huntgross.com, Sharon@huntgross.com) and Harry Winderman (harry4334@hotmail.com).

/s/ Shane P. Martin

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