

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

MATTHEW CARONE, as Trustee, et al.,

Plaintiffs,

v.

MICHAEL D. SULLIVAN,

Defendant.

CASE NO.: 12-24051 (07)

Division:

**MOTION TO WITHDRAW AS COUNSEL FOR BURT MOSS, STEVE JACOB,  
MICHAEL SULLIVAN, SCOTT HOLLOWAY, AND VARIOUS COMPANIES AND  
TRUSTS**

Robert F. Reynolds ("Reynolds") and Slatkin & Reynolds, P.A. ("S&R"), respectfully request the Court enter an order authorizing Reynolds and S&R to withdraw from their representation in this matter of Burt Moss, Steve Jacob, Michael Sullivan, Scott Holloway, and various companies and trusts that the above persons serve as representatives. As grounds in support thereof respectfully states as follows:

1. Undersigned counsel appeared at the hearings on December 18 and 21, 2012 on a limited basis objecting to the motion of other parties for the appointment of a receiver. That proceeding has been concluded with the Court ultimately appointing a conservator in this matter.

2. At the hearings in the case, undersigned counsel indicated to the Court that he was only appearing in the limited fashion because he was unable to represent the various parties that he represented at those hearings on a going forward basis because, although they were all in opposition to the appointment of a receiver and thus aligned on that issue, there is a conflict between their positions in the case going forward.

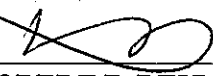
3. Undersigned counsel obtained a written waiver from the parties for the purpose of representing them at the receiver hearings, but does not believe conflict going forward can be waived. Accordingly, undersigned counsel now respectfully requests the Court enter an order granting counsel's Motion and authorizing counsel to withdraw.

4. This Motion is filed in an abundance of caution so that all parties recognize that undersigned counsel is not representing the parties represented at the hearing, which include Burt Moss, Steve Jacob, Michael Sullivan, Scott Holloway, and various companies and trusts that the above persons are representatives of in the case on a going forward basis. The undersigned's retainer agreement was clear that the scope of representation was limited to the receiver motions. However, so that there are no questions and/or issues going forward, the undersigned believes it is appropriate for the Court to enter an order recognizing that undersigned counsel will no longer be involved in the matter and is relieved from further representation of anyone in the case.

WHEREFORE, for the reasons stated herein, undersigned counsel respectfully requests the Court grant this Motion, enter an order authorizing undersigned counsel to withdraw as well as grant any further relief the Court deems proper under the circumstances.

Dated this 22<sup>nd</sup> day of March, 2013.

SLATKIN & REYNOLDS, P.A.  
Counsel for Various Partners  
One East Broward Boulevard, Suite 609  
Fort Lauderdale, Florida 33301  
Telephone 954.745.5880  
Facsimile 954.745.5890  
rreynolds@slatkinreynolds.com

By:   
ROBERT F. REYNOLDS  
Fla. Bar No: 174823

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing was furnished on this 22<sup>nd</sup> day of March,

2013 to:

Burt Moss, 1675 N. Military Trail, Suite 570, Boca Raton, FL 33486  
Michael Sullivan, 3696 North Federal Highway, Fort Lauderdale, FL 33308  
Scott Holloway, 55 Cayuga Road, Sea Ranch Lakes, FL 33308  
Steven Jacob, 3696 North Federal Highway, Fort Lauderdale, FL 33308  
Paroquia de Santa Luzia. c/o Fr. John Fitzpatrick, 1133 Broadway, Millbarae, CA 94030  
Mary V. Dunham, 1002 Gramerly Lane, Orlando, FL 32821  
Joseph A. Speizio, 39 Woodlot Road, Ridge, NY 11961  
Leonard K. Samuels, Esq., [lsamuels@bergersingerman.com](mailto:lsamuels@bergersingerman.com)  
Etan Marck, Esq., [emark@bergersingerman.com](mailto:emark@bergersingerman.com)  
Chad P. Pugatch, Esq., [cpugatch@rprslaw.com](mailto:cpugatch@rprslaw.com)  
Erika D. Rothart, Esq., [edrothart@dralwfir.com](mailto:edrothart@dralwfir.com)  
William G. Salim, Jr., Esq., [wsalim@mmssl.com](mailto:wsalim@mmssl.com); [cleibovitz@mmssl.com](mailto:cleibovitz@mmssl.com)  
Gary C. Rosen, Esq., [grosen@becker-poliakoff.com](mailto:grosen@becker-poliakoff.com)  
Domenica L. Frasca, Esq., [dfrasca@mayersohnlaw.com](mailto:dfrasca@mayersohnlaw.com)  
Peter Smith, Esq. and Helen D. Chaitman, Esq., Becker & Poliakoff, LLP, 45 Broadway, 8<sup>th</sup>  
Floor, New York, NY 10006  
Philip J. von Kahle, [philipvonkahle@moecker.com](mailto:philipvonkahle@moecker.com)  
Brett D. Lieberman, Esq., [blieberman@messana-law.com](mailto:blieberman@messana-law.com)

  
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ROBERT F. REYNOLDS

