

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA**

MALIBU MEDIA, LLC,

Plaintiff,

v.

CURT VANDENHEUVEL,

Defendant.

CASE NO. 3:13-cv-01579-PDB

PLAINTIFF’S COUNSEL’S MOTION TO WITHDRAW

Pursuant to M.D. Fla. L. R. 2.03(b), undersigned counsel files this Motion to request the entry of an order authorizing counsel’s withdrawal from representation of Plaintiff Malibu Media, LLC (“Plaintiff”), and states:

“[A] lawyer may withdraw from representing a client if: ... (3) the client fails substantially to fulfill an obligation to the lawyer regarding the lawyer’s services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled [or] (4) the representation ... has been rendered unreasonably difficult by the client....” Fla. R. Prof. Conduct 4-1.16(b). These foregoing circumstances are present, warranting undersigned’s withdrawal from representation. Should the Court have questions about the details necessitating the withdrawal, undersigned requests an *in camera* hearing so that undersigned may explain without disclosing privileged information.

WHEREFORE, undersigned requests that the Court enter an order authorizing undersigned’s withdrawal, and granting Plaintiff sixty (60) days to retain substitute counsel.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2016, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and that service was perfected on all counsel of record and interested parties through this system.

By: /s/ Daniel C. Shatz