

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

MALIBU MEDIA, LLC,

Plaintiff,

v.

GREGORY WEAVER,

Defendant.

CASE NO. 8:14-cv-01580

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,

LIPSCOMB EISENBERG & BAKER, PL
2 South Biscayne Blvd.
Penthouse 3800
Miami, FL 33131
Telephone: (786) 431-2228
Facsimile: (786) 431-2229
Attorneys for Plaintiff

By: /s/ M. Keith Lipscomb
M. Keith Lipscomb, Esq.
Florida Bar No. 429554
klipscomb@lebfirm.com

By: /s/ Daniel C. Shatz
Daniel C. Shatz, Esq.
Florida Bar No. 94696
dshatz@lebfirm.com

By: /s/ Emilie Kennedy
Emilie Kennedy, Esq.
Florida Bar No. 92808
ekennedy@lebfirm.com

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