

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT MICHIGAN**

MALIBU MEDIA, LLC,)	
)	
Plaintiff,)	Civil Action Case No. 1:13-CV-360-RJJ
)	
v.)	
)	
JESSE RALEIGH,)	
)	
Defendant.)	
_____)	

MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF

Undersigned counsel M. Keith Lipscomb of the law firm Lipscomb, Eisenberg & Baker, PL (“LEB”) hereby moves for entry of an Order authorizing his withdrawal from representation of Plaintiff Malibu Media, LLC (“Plaintiff”), and in support states:

1. “[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 respectfully requests that the Court enter an order authorizing undersigned’s withdrawal, and granting Plaintiff a sixty (60) day extension of all case deadlines to retain substitute counsel.

Dated: April 18, 2016

Respectfully submitted,

LIPSCOMB, EISENBERG & BAKER, PL

By: /s/ M. Keith Lipscomb
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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/ M. Keith Lipscomb