UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA ORLANDO DIVISION

CASE NO.: 6:12-cv-01493-CEH-KRS

FIRST TIME VIDEOS, LLC

Plaintiff,

v.

PAUL OPPOLD

Defendant

UNOPPOSED MOTION FOR WITHDRAWAL OF COUNSEL

COMES NOW the law firm of Jonathan A Torres, LLC, and requests leave of court pursuant to Local Rule 2.03 (b) to withdraw as counsel and moves for entry of an Order allowing such withdrawal in the above styled cause of action and, for good cause, would state as follows:

- That the law firm of Jonathan A Torres LLC is the attorney of record for Plaintiff.
- 2. That pursuant to Local Rule 3.01 (g), counsel for Plaintiff communicated via telephone conference with counsel for Defendant, Mr. Graham Syfert, Esq. on several prior occasions prior to submitting this Motion and Mr. Syfert stated that he had no objection or opposition to this Motion.
- That on May 31, 2013 a second Motion to Withdraw was filed (Document No.36), which was denied on June 4, 2013 due to the fact there was a pending

Response to Objections on the Magistrate Report and Recommendations (Document No. 38).

- That this issue has been resolved by the adoption of the Court of the Recommendations and Report of the Magistrate and Order Denying Motion for Attorney Fees (Document No. 40).
- 5. That at this time counsel respectfully requests that his Motion to Withdraw be granted.
- That the Order of the Magistrate on June 4, 2013 indicated that such Motion to Withdraw would be granted after the disposition of the Objection (Document No. 38).
- 7. That pursuant to Local Rule 2.03 (b), counsel for Plaintiff has provided more than ample notice in writing, by e-mail and by telephone messages of his intention to withdraw.
- 8. That this motion is made in good faith and not for the purpose of delay.
- 9. That a Proposed Order is attached to this Motion as an Attachment.

WHEREFORE, the law firm of Jonathan A Torres, LLC, respectfully request this Honorable Court enter an Order allowing the withdrawal of the law firm of Jonathan A Torres, LLC, as attorney of record, and adjudge that he shall be relieved of all further responsibilities in connection with the instant action.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 16, 2013, I electronically filed the foregoing using the ECF system which shall send an electronic copy and notification to all parties and respective counsel.

<u>/s/ Jonathan Torres</u> Jonathan Torres, Esquire Florida Bar No. 006287 Jonathan A. Torres, LLC. 1180 Spring Centre S. Blvd, Suite 355 Altamonte Springs, FL 32714 Telephone (407) 953-5818 E-mail: jonathantorresllc@gmail.com Attorney for Plaintiff