

IN THE CIRCUIT COURT OF THE 11th
JUDICIAL CIRCUIT IN AND FOR MIAMI-
DADE COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NUMBER: 2012-38306 CA 21

GROUP OF LENDERS ASSEMBLED ON
THE LOAN,

Plaintiff,

vs.

JUAN CARLOS VENTURA, individually,
JOSE M. VENTURA, individually, and
as Guarantors on the loan and note,

Defendants.

/

MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANTS

COMES NOW, the undersigned counsel, STEVEN E. GURIAN, ESQ., and MARIN, ELJAIEK, & LOPEZ, P.L., and files this Motion to Withdraw as Counsel for the Defendants, JUAN CARLOS VENTURA and JOSE M. VENTURA, (hereinafter "Defendants"), and in support thereof states:

1. The undersigned is counsel of record for the Defendants.
2. Due to irreconcilable differences with the Defendants the undersigned seeks leave from this Court to withdraw as counsel of record.
3. The undersigned seeks a stay of these proceeding for a period of thirty (30) days to allow the Defendants to retain new counsel.
4. The parties to this action would not be unduly prejudiced by the relief sought herein.

WHEREFORE, the undersigned, STEVEN E. GURIAN, ESQ. and MARIN, ELJAIEK, & LOPEZ, P.L., respectfully request that this Court grant it leave to withdraw as counsel and stay these proceedings from a period of thirty (30) to allow the Defendants to procure new counsel in this cause.

MARIN, ELJAIEK, & LOPEZ, P.L.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via e-mail this 21st day of January, 2016 upon: **Akerman, LLP**, Joan Levit, Esq., (joan.levit@akerman.com); **Robert L. Parks, P.L.**, Gabriel A. Garay, Esq., (ggaray@rlplegal.com).

/s/ Steven E. Gurian

STEVEN E. GURIAN, ESQ.,
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