

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

DANA R. GOLDMAN and
MICHAEL A. GATES, her spouse,

Complex Business Litigation Div.

Plaintiffs,
vs.

CASE NO. 12-25503 CA 03

**POINCIANA ISLAND YACHT AND
RACQUET CLUB CONDOMINIUM
ASSOCIATION, INC., ET AL.**

Defendants

MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFFS

Undersigned counsel for Plaintiffs Dana R. Goldman and Michael A. Gates, hereby files this Motion to Withdraw as record counsel, and states the following in support thereof:

1. Undersigned counsel has recently experienced significant health-related issues pursuant to which his physician has advised him to dramatically reduce his workload for an indeterminate period of time.
2. Accordingly, undersigned counsel, in reliance on medical advice, believes that withdrawal from record counsel representation of Plaintiffs in this cause is in the best interests of both Plaintiffs and undersigned counsel.
3. Plaintiffs' existing co-counsel, Neil D. Kodsi, will remain as counsel in this cause, and as such, the granting of the requested withdrawal will not cause any material adverse effect on the interests of Plaintiffs.
4. This case has not been set for trial and this Motion is not made for the purposes of delay or in bad faith.

WHEREFORE, it is respectfully requested that this Court allow Eric J. Miller, Esq., and the firm of Eric J. Miller, P.A., to withdraw as counsel for Plaintiffs in this cause, effective from the date of an Order thereon.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished in compliance with Fla. R. Jud. Admin. 2.060 to: Scott.bassman@csklegal.com and Craig.Minko@csklegal.com, Scott A. Bassman, Esq., Craig C. Minko, Esq., Cole Scott & Kissane, P.A., 110 Tower, 110 SE 6th Street, Suite 1850, Fort Lauderdale, Florida 33301, and to co-counsel Neil D. Kodsi, Esq., NDK@ndkodsilaw.com, and to Plaintiffs Dana R. Goldman and Michael A. Gates, 308 Poinciana Island Drive #710, Sunny Isles Beach, Florida 33160, on this 24th day of July 2015, and upon filing the foregoing through the Court's e-portal, and a true and correct copy of the foregoing was submitted via e-courtesy submission to Judicial Division (03).

/s/ Eric J. Miller

ERIC J. MILLER, ESQ.

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Eric J. Miller, P.A.

Counsel for Plaintiffs

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