

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT IN AND
FOR PALM BEACH COUNTY, FLORIDA

CIVIL DIVISION

CASE NO.: 50-2021-CA-008718-XXXX-MB

STATE OF FLORIDA,
OFFICE OF FINANCIAL REGULATION,

Plaintiff,

v.

NATIONAL SENIOR INSURANCE, INC.
(d/b/a Seeman Holtz); *et al*,

Defendants.

MOTION TO WITHDRAW OR LIMIT APPEARANCE AS COUNSEL

The law firm of LAW OFFICES OF SCOTT ALAN ORTH, P.A. and SCOTT ALAN ORTH, ESQ., (collectively, “Orth”), pursuant to Fla. R. Jud. Admin. 2.505, move this Court for an order permitting Orth’s withdrawal as Counsel¹ of Record for Defendants, NATIONAL SENIOR INSURANCE, INC. D/B/A SEEMAN HOLTZ, EMERALD ASSETS 2018, LLC, INTEGRITY ASSETS 2016, LLC, INTEGRITY ASSETS, LLC, PARA LONGEVITY 2014-5, LLC, PARA LONGEVITY 2015-3, LLC, PARA LONGEVITY 2015-5, LLC, PARA LONGEVITY 2016-3, LLC, PARA LONGEVITY 2016-5, LLC, PARA LONGEVITY 2018-3, LLC, PARA LONGEVITY 2018-5, LLC, PARA LONGEVITY 2019-3, LLC, PARA LONGEVITY 2019-5, LLC, PARA LONGEVITY 2019-6, LLC, PARA LONGEVITY VI, LLC, SH GLOBAL, LLC N/K/A PARA LONGEVITY V, LLC, SEEMAN-HOLTZ CONSULTING

¹ An attorney who has appeared as the attorney of record in a cause cannot effectively terminate the relation by withdrawal until he or she has made application to the court and obtained leave to make a formal withdrawal of record. *Fisher v. State*, 248 So. 2d 479 (Fla. 1971).

CORP., CENTURION INSURANCE SERVICES GROUP, LLC, CENTURION ISG Holdings, LLC, CENTURION ISG Holdings II, LLC, CENTURION ISG (Europe) Limited, CENTURION ISG SERVICES, LLC, CENTURION ISG FINANCE GROUP LLC, CENTURION FUNDING SPV I LLC, and CENTURION FUNDING SPV II LLC (the “CLIENT”) in this matter and as grounds therefore states as follows:

1. The client entities are now receivership entities and undersigned is unable to ethically and fairly represent the Client in this matter.
2. Pursuant to Fla. R. Jud. Admin. 2.505(f), Orth seeks an order from this Honorable Court permitting Orth to withdraw its representation of the Client and relieve Orth of any further obligations concerning Client in the instant case or to limit the representation as may be applicable.
3. Orth further requests that all pleadings be mailed directly to the attention of the Client at:

c/o Daniel J. Stermer, Receiver
Development Specialists, Inc.
500 W. Cypress Creek Road, Suite 400
Fort Lauderdale, Florida 33309

c/o Brian G. Rich, Esq. and Gavin C. Gaukroger, Esq.,
Attorney for Receiver
Berger Singerman LLP
525 Okeechobee Boulevard, Suite 1250
West Palm Beach, FL 33401
brich@bergersingerman.com
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WHEREFORE, the LAW OFFICES OF SCOTT ALAN ORTH, P.A. and SCOTT ALAN ORTH, ESQ., respectfully request that an Order be entered allowing withdrawal herein.

CERTIFICATE OF SERVICE

I CERTIFY that a copy has been filed, served and furnished to

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via the Florida Courts e-Filing Portal this 2nd day of October, 2023.

/s/ Scott Alan Orth, Esq.
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