

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 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 Defendant, GRACE HOLDINGS FINANCIAL, LLC (the “CLIENT”) in this matter, and as grounds therefore states as follows:

1. Irreconcilable differences have arisen between the undersigned and Client rendering the undersigned unable to ethically and fairly represent 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 Client and relieve Orth of any further obligations concerning Client in the instant case.
3. Orth further requests that all pleadings be mailed directly to the attention of the Client at:

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).

**Grace Holdings Financial, LLC.
1892 Abbey Road "J"
West Palm Beach, FL 33415**

and/or

**2732 Pointe Circle
Greenacres, FL 33413**

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 8th day of July, 2022.

/s/ Scott Alan Orth, Esq.
SCOTT ALAN ORTH, ESQ.
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