

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

STATE OF FLORIDA,  
OFFICE OF FINANCIAL REGULATION,

Plaintiff,

vs.

CASE NO.: 502021CA008718

NATIONAL SENIOR INSURANCE, INC.  
D/B/A SEEMAN HOLTZ, et. al.

Defendants.

\_\_\_\_\_ /

**MOTION TO WITHDRAW AS COUNSEL**

The law firm of Hill, Ward & Henderson, P.A., through undersigned attorney David L. Luikart, III, pursuant to Florida Rule of Judicial Administration 2.505, hereby move the Court for entry of an order authorizing the firm and its attorneys to withdraw from the representation of the Defendant Prime Short Term Credit, Inc. (“Prime STC”), and state as follows in support:

1. The undersigned law firm and David L. Luikart, III are currently counsel of record for Prime STC.
2. Due to the irreconcilable differences which have arisen between the undersigned and his client, the undersigned will be unable to effectively and properly continue representing Prime STC in this matter.
3. The withdrawal of undersigned counsel is consistent with the factors permitting withdrawal in the Rules Regulating the Florida Bar. *See* R. Regulating Fla. Bar 4-1.16(b) (“a lawyer may withdraw from representing a client if: (1) withdrawal can be accomplished without material adverse effect on the interests of the client; ...(3) the client fails substantially to fulfill an obligation to

the lawyer regarding the lawyer's services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled; (4) the representation will result in an unreasonable financial burden on the lawyer...; or (5) other good cause for withdrawal exists.”)

4. The last known address of Prime STC is:

Prime Short Term Credit, Inc.  
c/o Jordan N. Uditsky  
Grogan Hesse Uditsky, P.C.  
2 Mid-America Plaza, Suite 110  
Oakbrook Terrace, IL 60181  
[juditsky@ghulaw.com](mailto:juditsky@ghulaw.com)  
(630) 833-5533

5. No party will be prejudiced by the relief sought herein and no delay will result from allowing the undersigned to withdraw.

**WHEREFORE**, the law firm of Hill Ward Henderson respectfully requests that the Court enter an order authorizing the withdrawal of the undersigned as counsel of record for Defendant Prime Short Term Credit, Inc. and relieving them from all further responsibilities in this action and awarding such other relief as the Court considers just and appropriate.

Dated: November 13, 2024

/s/ David L. Luikart III  
David L. Luikart III (FBN: 021079)  
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*Attorneys for Prime Short Term Credit, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 13, 2024, a true and correct copy of the foregoing was filed electronically via the Court's electronic filing system that will serve a copy upon all counsel of record, and by electronic mail and certified mail to:

Prime Short Term Credit, Inc.  
c/o Jordy N. Uditsky  
Grogan Hesse Uditsky, P.C.  
2 Mid-America Plaza, Suite 110  
Oakbrook Terrace, IL 60181  
juditsky@ghulaw.com

*/s/ David L. Luikart III*  
\_\_\_\_\_  
Attorney