

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 20-CIV-81205-RAR

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

**COMPLETE BUSINESS SOLUTIONS GROUP,
INC. d/b/a PAR FUNDING, et al.,**

Defendants.

**UNOPPOSED MOTION TO WITHDRAW AS COUNSEL FOR
DEFENDANT MICHAEL C. FURMAN**

The undersigned counsel and law firm, Sallah Astarita & Cox, LLC (collectively, “Counsel”), respectfully move on an unopposed basis to withdraw as counsel for Defendant Michael C. Furman.

MEMORANDUM

An attorney’s request to withdraw from the representation on nonmandatory grounds is governed by Rule 4-1.16(b) of the Rules Regulating the Florida Bar. Under that Rule, counsel may withdraw if continued “representation will result in an unreasonable financial burden on the lawyer;” or that “other good cause for withdrawal exists.” *Id.*

Because Mr. Furman is currently unable to satisfy certain terms of his engagement agreement, Counsel’s continued representation of Mr. Furman will result in an unreasonable financial burden on the undersigned. It also constitutes good cause for Counsel’s withdrawal. In accordance with Local Rule 11.1(d)(3), Counsel has provided notice to Mr. Furman, which included an advanced copy of this motion and accompanying proposed order.

In accordance with Local Rule 11.1(d)(3), the Court, the Clerk, and parties may send mail and email to Defendant Michael C. Furman at the following addresses: 1615 Forum Place, Suite 500, West Palm Beach, FL 33401 and MikeCFurman@gmail.com.

CERTIFICATE OF GOOD FAITH CONFERENCE

In accordance with Local Rule 7.1(a)(3), the undersigned counsel has conferred with, and provided notice to, Amie Riggle Berlin, Esq., counsel for Plaintiff Securities and Exchange Commission, who does not oppose the instant relief.

CONCLUSION

WHEREFORE, the undersigned counsel and firm respectfully requests that the Court grant this unopposed motion and enter an order substantially similar to the attached proposed order.

Dated: April 14, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 14, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing is being served this day upon all counsel of record identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notice of Electronic Filing.

/s/ Jeffrey L. Cox
Jeffrey L. Cox

SERVICE LIST

VIA EMAIL AND U.S. MAIL

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Defendants.

**ORDER GRANTING UNOPPOSED MOTION TO WITHDRAW AS COUNSEL FOR
DEFENDANT MICHAEL C. FURMAN**

Attorneys Jeffrey L. Cox, James D. Sallah, Joshua Arnold Katz, and all of the law firm of Sallah, Astarita & Cox, LLC have moved to withdraw as counsel for Defendant Michael C. Furman. (ECF No. ____).

An attorney's request to withdraw from the representation on nonmandatory grounds is governed by Rule 4-1.16(b) of the Rules Regulating the Florida Bar. Counsel submits that the motion is based on the factors that continued "representation will result in an unreasonable financial burden on the lawyer" and that "other good cause for withdrawal exists." *Id.*

After considering the unopposed motion, record, and the relevant legal authorities, the Court **GRANTS** the Motion (ECF No. ____). The Court **FURTHER ORDERS** that:

1. Attorneys Jeffrey L. Cox, James D. Sallah, Joshua Arnold Katz, and the law firm Sallah Astarita & Cox, LLC are **DISCHARGED** as counsel of record in this case for Mr. Furman.
2. Mr. Furman has provided the following address and email address: 1615 Forum Place, Suite 500, West Palm Beach, FL 33401 and MikeCFurman@gmail.com.

3. The Court **DIRECTS** the Clerk to update the docket to reflect Mr. Furman's *pro se* status and to link the above address and email address with this party to ensure that the Clerk's Office will mail and email copies of future filings, correspondence, and orders, including this order, to him.

DONE AND ORDERED at Miami, Florida on April ____, 2021.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

Copies via email to:

MikeCFurman@gmail.com