

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
Case No. 9:20-cv-81205-RAR
Civil Division

SECURITIES & EXCHANGE
COMMISSION,
Plaintiff

v.

COMPLETE BUSINESS SOLUTIONS
GROUP, INC. d/b/a PAR FUNDING,
Defendant

_____ /

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

Pursuant to Local Rules 7.1 and 11.1, Elroy M. John, Jr., Esq., Jeremy I. Knight, Esq., and the law firm, Knight Law, P.A. (collectively “KNIGHT LAW”), hereby move to withdraw as counsel for Defendant, MICHAEL C. FURMAN (“FURMAN”).

1. FURMAN retained KNIGHT LAW to represent him at trial in the above-styled cause.
2. The scope of the representation having been exceeded, and KNIGHT LAW and FURMAN having reached no agreement to continue the representation, KNIGHT LAW now moves to withdraw.
3. FURMAN continues to be represented in this matter by Zachary P. Hyman, Esq. of the law firm, Millennial Law, Inc., 501 E. Las Olas Blvd., Ste. 200/308, Fort Lauderdale, FL 33301, Phone: (954) 271-2719, Email: Zach@MillennialLaw.com.

4. On June 1, 2022, the undersigned counsel provided notice, via email, of withdrawal as counsel to FURMAN. As of the date of this filing, FURMAN has raised no objection to the withdrawal.

WHEREFORE, Elroy M. John, Jr. Esq., Jeremy I. Knight, Esq., and the law firm, Knight Law, P.A., respectfully request that this Court enter an order granting the relief requested herein and relieving Elroy M. John, Jr. Esq., Jeremy I. Knight, Esq., and the law firm, Knight Law, P.A. from any further obligation in this matter to Defendant, MICHAEL C. FURMAN,

RULE 7.1(a)(3) CERTIFICATION

I HEREBY CERTIFY that on June 1, 2022, the undersigned counsel attempted to confer, via email, with all parties and non-parties who may be affected by the relief sought in the motion in a good faith effort to resolve the issues raised in the motion. As of the date of this filing, no party or non-party has raised objection to the motion.

Respectfully Submitted,

Knight Law, P.A.
4624 Hollywood Blvd Ste 203
Hollywood, Florida 33021
Telephone: 786.480.0045

By: /s/ Elroy M. John, Esq.
Florida State Bar No.: 1002480
Email: Elroy@KnightLawFL.com
Attorneys for Defendant, Michael C. Furman

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MOTION TO WITHDRAW AS COUNSEL

THIS CAUSE having come before this Court on the Motion to Withdraw as Counsel for Defendant, MICHAEL C. FURMAN, filed by Elroy M. John, Jr., Esq., Jeremy I. Knight, Esq., and the law firm, Knight Law, P.A., and the Court, having reviewed said motion and being fully advised in the premises, it is hereby:

ORDERED AND ADJUDGED as follows:

1. The Motion is GRANTED.
2. Elroy M. John, Jr., Esq., Jeremy I. Knight, Esq., and the law firm, Knight Law, P.A., are hereby relieved of any further obligation to Defendant, MICHAEL C. FURMAN, as counsel in the above-styled cause.

DONE AND ORDERED in Chambers in Fort Lauderdale, Florida, on
_____, 2022.

RODOLFO A. RUIZ II
U.S. DISTRICT COURT JUDGE