

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
West Palm Beach Division**

Securities and Exchange Commission;

Plaintiff,

Case No: 20-CV-81205-RAR

v.

Complete Business Solutions Group, Inc.
d/b/a Par Funding, *et al.*,

Defendants.

MOTION TO WITHDRAW AND FOR REMOVAL FROM SERVICE LIST

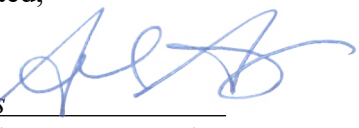
Pursuant to Local Rule 11.1(d)(3), attorney Averil Andrews hereby moves to withdraw as counsel of record in this matter. On December 23, 2022 Ms. Andrews entered her appearance in this matter on behalf of non-party Lakeport CF, LLC (“Lakeport”) for the limited purpose of filing its Motion for Relief from Litigation Stay [DE 1469] (“Motion”). Since then, the Motion has been adjudicated by this Court’s January 9, 2023 Order (1) Denying Non-Party Lakeport CF, LLC’s Motion for Relief from Litigation Stay..... and (2) Granting Receiver’s Motion to Lift Litigation Injunction to Allow Commendment of Proceedings Involving Lakeport CF, LLC [DE 1481].

Lakeport is not a party, seeks no further relief, and has further stake or interest in this case. For this reason, Ms. Andrews respectfully requests that she be granted leave to withdraw from this matter and to be removed from service. No Local Rule 7.1(a)(3) conferral is warranted because there are no parties or non-parties that will be affected by this motion. In addition, the notice requirement of Local Rule 11(d)(3)(A) is not feasible because Lakeport is not a participant in this case and there is no opposing counsel in this circumstance.

WHEREFORE, undersigned counsel respectfully requests that she be granted leave of court to withdraw from this case and to be removed from the service list in this matter.

Dated: April 27, 2023.

Respectfully submitted,


/s/Averil K. Andrews

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via the CM/ECF Filing System this 27th day of April, 2023, on counsel of record.

/s/ Salowa Khan

Allen Vellone Wolf Helfrich & Factor P.C.

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**[PROPOSED] ORDER GRANTING MOTION TO WITHDRAW AND FOR REMOVAL
FROM SERVICE LIST**

THIS MATTER comes before the Court on non-party Lakeport CF, LLC's ("Lakeport") Motion to Withdraw and for Removal from Service List. The Court, having reviewed the motion and being fully advised of the premises, hereby

ORDERS that the motion is GRANTED, and that counsel for Lakeport is hereby withdrawn from this case and removed from the service list in this matter.

Dated this ____ day of _____, 2023.

BY THE COURT:

United States District Judge