

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

CASE NO.: 20-CV-81205-RAR

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

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

/

**PLAINTIFF'S MOTION FOR AMIE RIGGLE BERLIN
TO WITHDRAW AS COUNSEL**

Pursuant to Southern District of Florida Local Rule 11.1(d)(3), Amie Riggle Berlin moves to withdraw as counsel in this matter due to the reassignment of her work duties for Plaintiff Securities and Exchange Commission. Berlin is no longer assigned to work on this litigation matter due to the assignment of other matters. Accordingly, Berlin's withdrawal should be deemed mandatory pursuant to Florida Rule of Professional Conduct 4-1.16a (providing withdrawal is mandatory when "the lawyer is discharged").

Berlin's withdrawal will not have a material adverse effect on the Commission. Further Alise Johnson remains the trial attorney on this case. Thus, Berlin's withdrawal will not have a material adverse effect because Johnson, counsel with knowledge of this case, continues to represent the Commission. Accordingly, Berlin's withdrawal is permissible under Florida Rule of Professional Conduct 4-1.15b.

WHEREFORE, Berlin respectfully requests that the Court permit her to withdraw.

May 20, 2025

Respectfully submitted,

Amie Riggle Berlin

Amie Riggle Berlin, Esq.

Senior Trial Counsel

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**ORDER GRANTING PLAINTIFF'S MOTION
TO WITHDRAW AS COUNSEL**

This matter is before the Court on the Commission's Motion for Amie Riggle Berlin to Withdraw as Counsel [D.E. #]. Having considered the motion and the record, it is:

HEREBY ORDERED AND ADJUDGED that the motion is granted. Amie Riggle Berlin is removed as counsel for the Commission.

DONE and ORDERED in Miami, Florida, this ____ day of May 2025.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

Copies to; Counsel of Record