

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

BURTON W. WIAND, as Receiver for
OASIS INTERNATIONAL GROUP, LTD.;
OASIS MANAGEMENT, LLC; AND
SATELLITE HOLDINGS COMPANY,

Case No. 8:20-cv-00862-VMC-TGW

Plaintiff,

v.

CHRIS AND SHELLEY ARDUINI, et al.

Defendants.

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

Edmund S. Whitson, III (“Whitson”) and the law firm of Adams and Reese LLP (“Adams and Reese”), pursuant to Local Rule 2.03, hereby moves for leave to withdraw as counsel for Defendants, Chris Arduini, Shelley Arduini, Ann Barton, Black Dragon Capital, LLC (Michael Obay), Walter and Julie Breese, Kayla Crowley, Patrick Flander, Anna Fuksman, Henry Fuksman, Chad Hicks, Courtney Hubbard, Richard Hubbard, Tim Hunte (dba KATT Distribution), Alan Johnston, Kevin Kerrigan, Kerrigan Management, Inc., Life’s Elements, Inc. (Kevin Johnson), David Paul Lipinczyk, Piotr Luda, Frank Nagel, Vince Petralis, Vince Petralis, Sr. and Sharon Petralis (collectively, “Defendants”), and in support hereof state:

1. Whitson, a partner of Adams and Reese, appeared in this case on November 3, 2020 by filing the first of two Motions for out-of-state attorney Brent Allan Winters (“Winters”) to appear *pro hac vice*. [D.E. 585 and 652]. Neither motion has been granted.

2. Adams and Reese has developed irreconcilable differences with Winters, and as such, Whitson cannot fulfill the responsibilities set forth in Local Rule 2.02(a).

3. The name and contact information of Defendants' representative to whom notices should be sent are:

Brent Allan Winters
5105 South Highway 41
Terre Haute, Indiana 47508
Email: brentallanwinters@nym.hush.com
Telephone Number: (317) 515-7695
Illinois Registration No. 6239670

4. Donald A. Mihokovich, Esq., of the law firm of Adams and Reese consulted telephonically with both Brent Allan Winters, and with counsel for Plaintiff, John W. Waechter, Esq., and neither has any objection to the granting of this motion to withdraw.

WHEREFORE, Edmund S. Whitson, III and the law firm of Adams and Reese LLP respectfully request that this Court enter an Order permitting Edmund S. Whitson, III and the law firm of Adams and Reese LLP to withdraw immediately as counsel of record for Defendants, Chris Arduini, Shelley Arduini, Ann Barton, Black Dragon Capital, LLC (Michael Obay), Walter and Julie Breese, Kayla Crowley, Patrick Flander, Anna Fuksman, Henry Fuksman, Chad Hicks, Courtney Hubbard, Richard Hubbard, Tim Hunte (dba KATT Distribution), Alan Johnston, Kevin Kerrigan, Kerrigan Management, Inc., Life's Elements, Inc. (Kevin Johnson), David Paul Lipinczyk, Piotr Luda, Frank Nagel, Vince Petralis, Vince Petralis, Sr. and Sharon Petralis, in this case.

/s Edmund S. Whitson, III
Edmund S. Whitson, III
Florida Bar No. 897272
edmund.whitson@arlaw.com
ADAMS AND REESE LLP
101 E. Kennedy Blvd., Suite 4000
Tampa, Florida 33602
Telephone: (813) 402-2880
Facsimile: (813) 402-2887

CERTIFICATE OF SERVICE

I hereby certify that on November 18, 2020, I electronically filed the foregoing Motion for Leave to Withdraw as Counsel for Defendants, Chris Arduini, Shelley Arduini, Ann Barton, Black Dragon Capital, LLC (Michael Obay), Walter and Julie Breese, Kayla Crowley, Patrick Flander, Anna Fuksman, Henry Fuksman, Chad Hicks, Courtney Hubbard, Richard Hubbard, Tim Hunte (dba KATT Distribution), Alan Johnston, Kevin Kerrigan, Kerrigan Management, Inc., Life's Elements, Inc. (Kevin Johnson), David Paul Lipinczyk, Piotr Luda, Frank Nagel, Vince Petralis, Vince Petralis, Sr. and Sharon Petralis, with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all parties of record.

/s Edmund S. Whitson, III

Edmund S. Whitson, III