

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

HEATHER MARIE KOTIS
RACHEL CHRISTINE MILL

CASE NO. 8:07-CV-00447-JSM-EAJ

Plaintiffs,

v.

DESLIN HOTELS, INC., et al.

Defendants.

MOTION TO WITHDRAW AS COUNSEL

The Solomon Tropp Law Group, P.A. (“**Solomon Tropp**”), co-counsel for Heather Marie Kotis and Rachel Christine Mill (“**Plaintiffs**”) hereby moves the Court, pursuant to Rule 2.03(b), Local Rules, Middle District of Florida, for an order permitting this firm to withdraw as co-counsel of record for Plaintiffs in this action. As grounds for this Motion, co-counsel states:

1. Richard S. Shankman, Esquire (“**Shankman**”) has been counsel for Plaintiffs for several years in this case.
2. Solomon Tropp was brought in to serve as co-counsel for the purpose of acting as lead trial counsel in this and related cases.
3. Shankman will continue to represent Plaintiffs’ interests as counsel in this action.
4. The demands of upon Solomon Tropp’s practice make it impractical for them to remain as co-counsel with Shankman in this case.

5. Because this case is in its infancy, Plaintiffs will not be prejudiced by co-counsel's withdrawing from this action.

6. In accordance with Local Rule 2.03(b), the clients and opposing counsel have had ten days notice of our intention to withdraw prior to the filing of this motion.

7. In accordance with Local Rule 3.01(g), the undersigned counsel has attempted to confer with counsel of record for all remaining parties, and no objections were expressed.

WHEREFORE, the Court should authorize The Solomon Tropp Law Group, P.A. to withdraw as counsel of record for Plaintiffs in this action.

Respectfully submitted,

/s/ Mark S. Howard

Mark S. Howard

Florida Bar No. 774146

mhoward@solomonlaw.com

THE SOLOMON TROPP LAW GROUP, P.A.

1881 West Kennedy Boulevard

Tampa, Florida 33606-1606

(813) 225-1818 (Tel)

(813) 225-1050 (Fax)

Attorneys for **Heather Kotis and**

Rachel Mill

Certificate of Service

I HEREBY CERTIFY on June 21, 2007 that a true and correct copy of the foregoing has been furnished via electronic service copy to the following:

Scott Wallace Cichon
scich@ccb.com
Kathryn Diane Weston
kathy.weston@cobbcole.com
Cobb & Cole, PLLC
150 Magnolia Ave.
PO Box 2491
Daytona Beach, FL 32115-2491
386/255-8171
386/248-0323 (fax)
Attorneys for **Deslin Hotels, Inc., Dennis B. Devlin and Irene L. Devlin**

John F. Lauro
jlauro@laurolawfirm.com
Scott J. Flint
sflint@laurolawfirm.com
John F. Lauro Law Firm
101 E. Kennedy Blvd.
Suite 2180
Tampa, FL 33602
813/222-8990
813/222-8991 (fax)
Attorneys for **Jucco Holdings, Inc.**

Camille Godwin
cgodwin@tampalawfirm.com
Cohen, Jayson & Foster, P.A.
201 E. Kennedy Blvd.
Suite 1000
Tampa, FL 33602
813/225-1655
813/225-1921 (fax)
Attorneys for **BV & BK Productions, LLLP and Chad W Ciani**

William A. Delgado
Willenken Wilson Loh & Lieb LLP
707 Wilshire Blvd
Suite 3850
Los Angeles, CA 90017
213/955-9240
213/955-9250 (fax)
Attorneys for **Jucco Holdings, Inc.**

Gary S. Edinger
GSEdinger@aol.com
Law Office of Gary Edinger, P.A.
305 NE 1st Street
Gainesville, FL 32601
352/338-4440
352-337-0696 (fax)
Attorneys for **Svothi, Inc.**

Barry Scott Richard
richardb@GTlaw.com
Greenberg Traurig P.A.
101 E. College Ave.
P.O. Box 1838
Tallahassee, FL 32302
850/222-6891
850/681-0207 (fax)
Attorneys for **Mantra Films, Inc.**

Laureen E. Galeoto
galeotol@GTlaw.com
Karusha Y. Sharpe
sharpek@gtlaw.com
Greenberg Traurig P.A.
101 E. College Ave.
Tallahassee, FL 32301
850/222-6891
850/681-0207 (fax)
Attorneys for **Mantra Films, Inc.**

Richard Stuart Shankman
shankmantancredo@aol.com
Litigation Concepts
2536 NW 53rd St.
Boca Raton, FL 33496-2204
561/997-2771
813/754-2132 (fax)
Attorneys for **Heather Marie Kotis**
and **Rachel Christine Mill**

/s/ Mark S. Howard

Mark S. Howard
Florida Bar No. 774146
mhoward@solomonlaw.com
THE SOLOMON TROPP LAW GROUP, P.A.
1881 West Kennedy Boulevard
Tampa, Florida 33606-1606
(813) 225-1818 (Tel)
(813) 225-1050 (Fax)
Attorneys for **Heather Kotis and**
Rachel Mill