

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

SECURITIES AND EXCHANGE
COMMISSION,
Plaintiff,

Case No: 8:09-cv-87-T-26TBM

v.
ARTHUR NADEL; SCOOP CAPITAL, LLC;
and SCOOP MANAGEMENT, INC.,
Defendants,

SCOOP REAL ESTATE, L.P.; VALHALLA
INVESTMENT PARTNERS, L.P.;
VALHALLA MANAGEMENT, INC.;
VICTORY IRA FUND, LTD.; VICTORY
FUND, LTD.; VIKING IRA FUND, LLC;
VIKING FUND, LLC; and VIKING
MANAGEMENT, LLC,
Relief Defendants.

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL
FOR PAUL DOWNEY AND JEFF DOWNEY**

The Law Firm of Lewis Brisbois Bisgaard & Smith, LLP and its attorneys hereby move the Court for leave to withdraw as counsel for Paul Downey and Jeff Downey (the “Downeys”), in the above-styled matter and to have their names removed from the service list in this matter and be relieved of all further responsibilities to the Downeys in this matter.

Irreconcilable differences have arisen between the Downeys and undersigned counsel necessitating the withdrawal of counsel from this case.

Counsel have good cause to make this motion, and circumstances have arisen that prevent them from continuing to represent the Downeys and that permit them to withdraw in accordance with Rule 4-1.16(b) of the Florida Rules of Professional Conduct. Counsel have advised the Downeys that they will seek leave to withdraw from this action. The Downeys have advised that they consent to the withdrawal.

For the reasons set forth in this motion, Counsel respectfully request that the Court enter the proposed order submitted herein.

Respectfully submitted,
LEWIS BRISBOIS BISGAARD & SMITH LLP

s/John A. Rine

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Attorneys for Paul Downey and Jeff Downey and Quest Management Group, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21st day of October, 2014, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

s/John A. Rine

Attorney