

IN THE CIRCUIT COURT OF THE 11th  
JUDICIAL CIRCUIT IN AND FOR MIAMI-  
DADE COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NUMBER: 2012-38306 CA 21

GROUP OF LENDERS ASSEMBLED ON  
THE LOAN,

Plaintiff,

vs.

JUAN CARLOS VENTURA, individually,  
JOSE M. VENTURA, individually, and  
as Guarantors on the loan and note,

Defendants.

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**MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANTS**

**COMES NOW**, the undersigned counsel, STEVEN E. GURIAN, ESQ., and MARIN, ELJAIEK, & LOPEZ, P.L., and files this Motion to Withdraw as Counsel for the Defendants, JUAN CARLOS VENTURA and JOSE M. VENTURA, (hereinafter “Defendants”), and in support thereof states:

1. The undersigned is counsel of record for the Defendants.
2. Due to irreconcilable differences with the Defendants the undersigned seeks leave from this Court to withdraw as counsel of record.
3. The undersigned seeks a stay of these proceeding for a period of thirty (30) days to allow the Defendants to retain new counsel.
4. The parties to this action would not be unduly prejudiced by the relief sought herein.

**WHEREFORE**, the undersigned, STEVEN E. GURIAN, ESQ. and MARIN, ELJAIEK, & LOPEZ, P.L., respectfully request that this Court grant it leave to withdraw as counsel and stay these proceedings from a period of thirty (30) to allow the Defendants to procure new counsel in this cause.

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing was served via e-mail this 21<sup>st</sup> day of January, 2016 upon: **Akerman, LLP**, Joan Levit, Esq., ([joan.levit@akerman.com](mailto:joan.levit@akerman.com)); **Robert L. Parks, P.L.**, Gabriel A. Garay, Esq., ([ggaray@rlplegal.com](mailto:ggaray@rlplegal.com)).

*/s/ Steven E. Gurian* \_\_\_\_\_

**STEVEN E. GURIAN, ESQ.,**

*Attorney for Defendants*

**MARIN, ELJAIK, & LOPEZ, P.L.**

2601 South Bayshore Drive, Suite 850

Coconut Grove, Florida 33133

Tel: 305-444-5969

Fax: 305-444-1939

E-mail: [SG@mellawyers.com](mailto:SG@mellawyers.com)

Florida Bar No. 101511