UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

**FEDERAL TRADE COMMISSION,**

Plaintiff,

v. Case No.: 8:15-cv-02231-MSS-TBM

**ROCA LABS, INC.,** a corporation; **ROCA LABS NUTRACEUTICAL USA, INC.,** a corporation; **MUST CURE OBESITY, CO.,** a corporation; **JURAVIN, INCORPORATED,** a corporation; **ZERO CALORIE LABS, INC.,** a corporation; **DON JURAVIN,** Individually and as an officer of Roca Labs, Inc., Roca Labs Nutraceutical USA, Inc., Must Cure Obesity, Co., and Juravin, Incorporated; and **GEORGE C. WHITING,** Individually and as an officer of Roca Labs, Inc., Roca Labs Nutraceutical USA, Inc., and Zero Calorie Labs, Inc.,

Defendants.
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**DEFENDANTS' MOTION TO DISCHARGE ATTORNEY GLENN A. REID AND INCORPORATED MEMORANDUM OF LAW**

COME NOW Defendants ROCA LABS, INC., ROCA LABS NUTRACEUTICAL USA, INC., MUST CURE OBESITY, CO., JURAVIN, INCORPORATED, ZERO CALORIE LABS, INC., DON JURAVIN, and GEORGE C. WHITING (collectively "Defendants"), by and through the undersigned counsel, and files this, their Motion to Discharge Attorney Glenn A. Reid and Incorporated Memorandum of Law, and in support thereof, state as follows:

1. On February 28, 2017, attorney Glenn A. Reid filed his Notice of Additional Counsel Appearance on behalf of all Defendants in this matter (Dkt. 114).

2. Mr. Reid remains an attorney of record for the Defendants in this matter, and owes them various fiduciary and ethical duties attendant to that representation. Despite this fact, for the past several months, he has almost completely abandoned these clients and neglected the duties owed to them, in both the instant case, as well as others that remain pending before various other tribunals.

3. This abandonment has occurred during critical junctures of Mr. Reid's representation of the Defendants. Without waiving the attorney-client privilege, most recently, Mr. Reid was almost completely absent during the period in which the Defendants were preparing their response to the Plaintiff's Amended Motion for Summary Judgment, forcing the Defendants to expend significant resources compensating for this absence.

4. Additionally, various other actions (and inaction) on the part of Mr. Reid have caused the Defendants to "doubt" (to put it mildly) that Mr. Reid is acting in their best interest.

5. It is therefore an understatement that the attorney-client privilege is irretrievably broken. Discharging Mr. Reid from his representation of the Defendants in this matter is in the best interest of all parties involved.

6. As the undersigned has been involved in this case for the last five (5) months, no prejudice to the Plaintiff will result from terminating Mr. Reid's representation.

7. As noted by the Florida Supreme Court eighty (80) years ago: "The authorities universally recognize the right of a client to terminate the relationship between himself and his attorney at his election, with or without cause, the existence or nonexistence of valid cause for

the discharge of the attorney bearing only on his right to compensation. The right of a client to change his attorney at will is based on necessity, in view of both of the delicate and confidential relation between them and of the evil engendered by friction and distrust." *Goodkind v. Wolkowski*, 180 So. 538, 540 (Fla. 1938).

8. Defendants now seek to exercise that right, and end Mr. Reid's representation of them in this matter.

9. The undersigned acknowledges his duty to confer with counsel for the Plaintiff on this matter, pursuant to Local Rule 3.01(g). The undersigned has not yet conferred with counsel for the Plaintiff on this matter, but will do so, and will supplement this motion, as contemplated by Local Rule 3.01(g).

WHEREFORE, Defendants respectfully request this Court enter an Order discharging attorney Glenn A. Reid and terminating his representation of the Defendants, and for such further relief as this Court deems just and proper.

*/s/ Andrew C. Hill*
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**CERTIFICATE OF SERVICE**

The undersigned counsel certifies that on June 6, 2018, the foregoing was electronically filed with the clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to the attorneys of record.

*/s/ Andrew C. Hill*
ANDREW C. HILL