IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
CASE NO. 17-CV-80619-WPD

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

STRATEGIC STUDENT SOLUTIONS LLC, a limited liability company, STRATEGIC CREDIT SOLUTIONS LLC, a limited liability company, STRATEGIC DEBT SOLUTIONS LLC, a limited liability company, STRATEGIC DOC PREP SOLUTIONS LLC, a limited liability company, STUDENT RELIEF CENTER LLC, a limited liability company, CREDIT RELIEF CENTER LLC, a limited liability company, and,

DAVE GREEN, individually and as an officer of STRATEGIC STUDENT SOLUTIONS LLC, STRATEGIC CREDIT SOLUTIONS LLC, STRATEGIC DEBT SOLUTIONS LLC, STRATEGIC DOC PREP SOLUTIONS LLC, STUDENT RELIEF CENTER LLC, and CREDIT RELIEF CENTER LLC,

Defendants, and

DG INVESTMENT PROPERTIES LLC,

Relief Defendant.
_____/

GREENSPOON'S REPLY IN FURTHER
SUPPORT OF ITS MOTION TO WITHDRAW AS COUNSEL

The law firm of Greenspoon Marder, P.A. and Attorneys Richard W. Epstein and Jeffrey A. Backman (collectively, "Greenspoon") submit this Reply in further support of their motion to

withdraw as counsel of record for Defendants Strategic Student Solutions, LLC, Strategic Credit Solutions, LLC, Strategic Debt Solutions, LLC, Strategic Doc Prep Solutions, LLC, Student Relief Center, LLC, Credit Relief Center, LLC and Dave Green, and Relief Defendant DG Investment Properties LLC (collectively, "Defendants"). This Reply is being filed solely because Mr. Green, on behalf of Defendants, filed a Response to Greenspoon's Motion on June 29, 2017. In the Response, Mr. Green acknowledged that Defendants have not paid the remainder of the retainer due, and requests, among other things, that the Court nonetheless "have counsel see me through this process and remain counsel until such time I am able to pay counsel their reasonable fees." (Dkt. No. 51 at 2).

While Greenspoon is sympathetic to Mr. Green's financial difficulties given the impacts of the Temporary Restraining Order issued at the outset of this action and continued in the Preliminary Injunction, as the Response concedes, Defendants had financial obligations to Greenspoon that they breached. Moreover, no prejudice will result from the requested withdrawal considering that the case has been pending for only six weeks. Greenspoon is unable to reply more fully to Defendants' Response due to attorney-client privilege and the Rules of Professional Conduct. If, however, the Court deems it necessary we are prepared to discuss these issues and the Motion *in camera* to the extent possible.

WHEREFORE, the law firm of Greenspoon Marder, P.A. and Attorneys Richard W. Epstein and Jeffrey A. Backman, request that this Court enter an Order allowing them to withdraw as counsel for Defendants, granting Defendants thirty (30) days to retain new counsel, and staying the proceedings during the thirty (30) day period.

Dated: June 30, 2017

GREENSPOON MARDER, P.A.

/s/ Jeffrey A. Backman

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed with the Clerk of the Court by using CM/ECF service on this 30th day of June, 2017 which will provide copies to all counsel of record, and a copy is being served upon Mr. Green by e-mail.

/s/Jeffrey A. Backman
Jeffrey A. Backman