UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

Case No. 19-cv-1028-40LRM

FIRST CHOICE HORIZON LLC, a Florida limited liability company, *et al.,*

Defendants.

_____/

LAW OFFICE OF ROBERT ECKARD & ASSOCIATES, P.A.'S MOTION FOR LEAVE TO FILE A REPLY

COMES NOW, THE LAW OFFICE OF ROBERT ECKARD & ASSOCIATES, P.A., specifically, ROBERT D. ECKARD B.C.S. and BETH ANN TOBEY, ESQUIRE ("LORE"), pursuant to Local Rule 3.01 (c) and (d), hereby respectfully requests this Court for Leave to file, no later than ten (10) days after the grant of this Motion, a reply of no more than three (3) pages to Plaintiff Federal Trade Commission's Response in Opposition to Law Office of Robert Eckard & Associates, P.A.'s Motion to Withdraw as Counsel for Defendants (Doc. 66). In support of this Motion, LORE states:

1. On or about September 5, 2019, LORE filed a Motion to Withdraw as Counsel for Defendants (Doc. 62).
2. On or about September 19, 2019, Plaintiff filed its Response in Opposition to LORE's Motion to Withdraw as Counsel for Defendants (Doc. 66).
3. In the Response, Plaintiff asserts that LORE should not be granted leave to withdraw for the following reasons:

a. The Corporate Entities are required to have counsel.

b. Defendants' Financial Obligations to Defense Counsel is not a Sufficient Basis to Permit Withdrawal.

c. Based on the Totality of Circumstances, Withdrawal should not be permitted.

4. However, in its Response, Plaintiff fails to address all the grounds LORE raised in the Motion to Withdraw and alleges LORE does not meet the requirement to permit withdrawal.

5. As such, LORE seeks leave to file a Reply to further address the issues raised by Plaintiff.

6. This Motion for Leave to File a Reply is neither being imposed to delay or hinder this cause, but rather being filed in good faith.

WHEREFORE, the undersigned respectfully requests that this Honorable Court grant LORE leave to file a Reply to Plaintiff Federal Trade Commission's Response in Opposition to Law Office of Robert Eckard & Associates, P.A.'s Motion to Withdraw as Counsel for Defendants, not to exceed three (3) pages and to be filed within ten (10) days from the granting of this Motion, and grant such other relief as this Honorable Court deems proper and just.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 3.01(g)

Pursuant to Local Rule 3.01(g), the undersigned conferred with counsel for the Plaintiff, Michael Boutros, who has advised that he cannot agree to the Motion but will not oppose the relief requested herein.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 24th, 2019, a true and correct copy of the foregoing has been electronically filed through the CM/ECF system. I also certify that the foregoing document is being served this day on all counsel of record and Counsel for the Receiver, via Electronic Mail:

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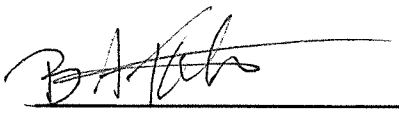
All Defendants by US Mail or Email

LAW OFFICE OF ROBERT ECKARD & ASSOCIATES, P.A.



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