IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT, IN AND FOR BROWARD COUNTY, FLORIDA CASE NO. CACE-15-017198

FREEDOM MORTGAGE CORPORATION Plaintiff,

VS.

SPOKEN WORD MINISTRIES A/K/A SPOKEN WORD MINISTRIES, INC., et al. Defendants.

## MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANTS

COMES NOW, undersigned counsel files this Motion to Withdraw and requests this Honorable Court for an Order allowing Vladimir R. St. Louis, Esq. and the Law Firm of St. Louis Morris, P.A., to withdraw from representing Defendants, KIMBERLY MARVINA DANIELS and SPOKEN WORD MINISTRIES A/K/A SPOKEN WORD MINISTRIES, INC., and as grounds therefore would state:

- 1. That there are irreconcilable differences between the Defendants and the undersigned law firm and its attorneys. *See Horan v. O'Connor*, 832 So. 2d 193 (Fla. 4th DCA 2002).
- 2. The last known address of the Defendants are:

11881 Piccadilly Place Davie, Florida 33325

**WHEREFORE**, undersigned counsel respectfully requests that the Court grant this motion and enter an order allowing counsel to withdraw from further representation of Defendants.

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 21, 2017, I electronically filed the foregoing document with the Clerk of the Court using the Florida Courts E-Filing Portal; the foregoing

1

## St. Louis Morris, P.A.