

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA**

CASE NO. 3:22-cv-00487-TJC-MCR

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

MICHAEL RANDO, et al.,

Defendants.

UNOPOSED MOTION FOR LEAVE TO WITHDRAW

Pursuant to Local Rule 2.02, undersigned counsel Michael R. Freed, L.T. Lafferty, Nathan W. Hill, Jonathan K. Osborne, and Samantha V. Medina, and the Gunster law firm (the “Movants”) respectfully request leave to withdraw as counsel of record for Defendants Michael Rando and Valerie Rando (the “Individual Defendants”) and Defendants Prosperity Training Technology LLC, First Coast Matchmakers Inc., First Coast Matchmakers LLC, Digital Business Scaling LLC, and Financial Consulting Management Group LLC (the Corporate Defendants), and in support state as follows:

1. Movants were retained to represent Individual Defendants and Corporate Defendants.
2. This matter was administratively closed on October 18, 2022. (Doc. 106), after a settlement was reached.

3. On January 10, 2023, the Court entered an Order granting the Parties' Joint Motion for Permanent Injunction that, among other things, appointed Maria M. Yip as equity Receiver over the Corporate Defendants. (Doc. 116). As a result of the appointment of the Receiver, Movants currently only represent the Individual Defendants.

4. There are irreconcilable differences between the Movants and the Individual Defendants that require the Movants to withdraw as counsel of record in this matter.

5. The undersigned hereby certifies that the Individual Defendants Michael Rando and Valerie Rando were provided fourteen days' notice of this requested withdrawal.

6. This matter is closed and there are no current deadlines. As such, the requested withdrawal will not cause the continuance of a trial.

7. Movants withdrawal will result in the Individual Defendants proceeding pro se. Accordingly, pursuant to Local Rule 2.02(c)(B)(ii), Michael Rando's contact information is as follows: 698 Friargate Court, Jacksonville, Florida 32225, mikerando10x@gmail.com, (904) 864-8828. Valerie Rando's contact information is as follows: 698 Friargate Court, Jacksonville, Florida 32225, valerierando10x@gmail.com, (904) 738-2186.

WHEREFORE, the Movants respectfully request that the Court grant this Motion and permit them to withdraw as counsel of record for the Individual Defendants and, to the extent necessary, the Corporate Defendants.

LOCAL RULE 2.02(c) and 3.01(g) CERTIFICATE OF CONFERRAL

I certify that Defendants Michael and Valerie Rando were provided fourteen days' notice of this requested withdrawal. Movants also conferred with counsel for the Plaintiff and Receiver both of whom do not oppose the relief sought in this Motion.

Dated: April 6, 2023

**GUNSTER, YOAKLEY &
STEWART, P.A.**

By: /s/Nathan W. Hill

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of April, 2023 a true and correct copy of the foregoing document was electronically filed with the United States District Court for the Middle District of Florida using the CM/ECF system which will send notification of such filing to all counsel of record. Copies sent to Michael and Valerie Rando via email at mikerando10x@gmail.com and valerierando10x@gmail.com and via US Mail at 698 Friargate Court, Jacksonville, Florida 32225.

By: /s/ Nathan W. Hill