

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT IN
AND FOR PALM BEACH COUNTY, FLORIDA

IN RE:

CASE NO. 50-2012-CP-004391-XXXX-NB

ESTATE OF SIMON L. BERNSTEIN

PBY&A's Motion to Withdraw as Counsel for Joshua Bernstein

The undersigned counsel, Paul D. Turner, Esq., D. Porpoise Evans, Esq., and the law firm of Perlman, Bajandas, Yevoli & Albright, P.L., (collectively the "Firm"), requests that this Honorable Court enter an Order permitting their withdraw from this case and from further representation of Beneficiary, Joshua Bernstein ("Beneficiary"), and as grounds state the following:

1. Beneficiary retained the Firm to represent him in this case.
2. Pursuant to Rule 4-1.16(b), Florida Rules of Professional Conduct, grounds exist for this Court to allow the Firm's withdraw from representing Beneficiary.
3. These matters constitute irreconcilable differences between the Firm and Beneficiary and good cause for withdrawal.
4. Due to the irreconcilable differences which have arisen the Firm and Beneficiary, Undersigned Counsel will be unable to effectively and properly continue representing Beneficiary in this case.
5. Papers and documents can be served on Beneficiary at: 2753 NW 34th Street, Boca Raton, FL 33434.

Wherefore, the Firm requests this Court enter an order granting their motion to withdraw as counsel for Beneficiary, and awarding any such further relief this Court deems just and proper.

Certificate of Service

I certify that a true and correct copy of the foregoing document is being served, pursuant to Rule 2.516(b), Fla. R. Jud. Admin., *via* Florida Courts e-Filing Portal to the names and e-mail addresses provided by all parties, counsel of record and *pro se* parties; and by U.S. Mail to Joshua Bernstein at 2753 NW 34th Street, Boca Raton, FL 33434.

Dated: October 11, 2018.

Respectfully submitted,

/s/ Paul Turner

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