

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

vs.

Case No. 8:20-cv-00394

KINETIC INVESTMENT GROUP, LLC AND
MICHAEL SCOTT WILLIAMS,

Defendants, and

KINETIC FUNDS I, LLC,
KCL SERVICES, LLC D/B/A LENDACY,
SCIPIO, LLC, LF42, LLC,
EL MORRO FINANCIAL GROUP, LLC, AND
KIH, INC. F/K/A KINETIC INTERNATIONAL, LLC

Relief Defendants

**GREENBERG TRAURIG, P.A.'S UNOPPOSED MOTION TO
WITHDRAW AS COUNSEL OF RECORD FOR
DEFENDANT MICHAEL SCOTT WILLIAMS**

The law firm of Greenberg Traurig, P.A., and attorneys Gregory W. Kehoe, Danielle Kemp, Joseph Picone and Steven Malina, appearing *pro hac vice*, (the "Firm") move for leave to withdraw as counsel of record for Defendant Michael Scott Williams ("Defendant"), and state as follows:

1. The Firm appeared as Defendant's counsel on February 25, 2020 [ECF No. 11, 12 and 13].
2. The Firm has not received compensation for any legal fees and expenses incurred since January 31, 2020, despite rendering extensive legal services to Defendant prior to the hearing on March 6, 2020, including, but not limited to: background factual

investigation and legal research, review of a substantial number of documents, multiple conferences with Defendant, analysis and strategy-planning regarding Plaintiff's Complaint and applications for emergency relief and preparation for the hearing on same.

3. Since the Court's March 6, 2020 Orders were entered, the Firm has continued to render extensive legal services to the Defendant, including but not limited to: coordinating responses to ongoing Receiver requests for documents, information and physical property, drafting Defendant's Answer and Case Management Report, and multiple communications with Defendant and counsel for the Plaintiff and the Receiver. The Firm has not been compensated for any legal services rendered to Defendant since March 6, 2020.

4. Pursuant to the Court's Order dated May 8, 2020, the Firm has frozen \$500,000 in its retainer account. Said funds will be transferred in accordance with the Court's directive(s).

5. The Firm notified counsel for Plaintiff and the Receiver of its intention to withdraw as Defendant's counsel on May 20, 2020. The Firm has been advised that the Plaintiff and Receiver do not oppose this Motion.

6. The Firm also notified the Defendant of its intention to withdraw as his counsel on May 20, 2020, and the Firm has been advised that the Defendant does not oppose this Motion. The Firm has also consulted with a qualified securities litigator who is in consultation with the Defendant about representing him in this matter. The Firm understands that the potential substitute counsel is aware of the Orders entered in this matter, and it is our understanding that the potential substitute counsel has been retained by Defendant and will be filing a notice of appearance shortly.

WHEREFORE, the Firm respectfully requests that it (including attorneys Gregory W. Kehoe, Danielle Kemp, Joseph Picone and Steven M. Malina) be permitted to withdraw as counsel of record and discharged of any further obligation to represent Defendant.

LOCAL RULE 3.01(g) CERTIFICATE

Pursuant to Local Rule 3.01(g), counsel for Defendant has conferred with counsel for the Plaintiff and counsel for the Receiver, who do not oppose the requested relief.

Dated: May 27, 2020

Respectfully submitted,

/s/ Gregory W. Kehoe

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*Attorneys for Defendant Michael Scott
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CERTIFICATE OF SERVICE

I CERTIFY that on May 27, 2020 I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send notice to electronic filing to counsel of record.

/s/ Gregory W. Kehoe
Attorney