

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
Miami Division**

Case No. 15-23070-Civ-COOKE/TORRES

Referred to Magistrate Judge Edwin G. Torres,  
Order of Reference dated August 18, 2015 [ECF No. 10]

CONSUMER FINANCIAL PROTECTION  
BUREAU,

Plaintiff/Counter-Defendant,

v.

ORION PROCESSING, LLC, a Texas limited liability company d/b/a World Law Processing, Wld Credit Repair, and World Law Debt; FAMILY CAPITAL INVESTMENT & MANAGEMENT LLC, a Delaware limited liability company a/k/a FCIAM Property Management, WORLD LAW DEBT SERVICES, LLC, a Delaware limited liability company; DERIN SCOTT, an individual; DAVID KLEIN, an individual; and BRADLEY JAMES HASKINS, individually and d/b/a World Law Group, LLP, World Law Group America, LLP, WLD Price Global, Inc., World Law Forms And Mediation, and World Law South,

Defendants/Counter-Plaintiffs,

SHANNON SCOTT, an individual,

Relief Defendant/Counter-Plaintiff.

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**FOX ROTHSCHILD, LLP'S MOTION TO WITHDRAW AS COUNSEL FOR  
DEFENDANTS/COUNTER-PLAINTIFFS, DERIN SCOTT AND DAVID KLEIN,  
AND RELIEF DEFENDANT/COUNTER-PLAINTIFF, SHANNON SCOTT**

Fox Rothschild, LLP and its attorneys, including Jeffrey Cohen, Joseph DeMaria, David Greene and Eric Bevan (individually and collectively, "Fox"), counsel for Defendants/Counter-Plaintiffs, Derin Scott and David Klein, and Relief Defendant/Counter-Plaintiff, Shannon Scott, hereby request leave of Court to withdraw as counsel for Derin Scott, David Klein and Shannon Scott (collectively, the "Klein/Scott Defendants") and state:

1. Irreconcilable differences have arisen between Fox and the Klein/Scott Defendants, and Fox can no longer act as counsel for the Klein/Scott Defendants.

2. Fox therefore requests that it be permitted to immediately withdraw from the representation of the Klein/Scott Defendants.

3. The Klein/Scott Defendants would not be prejudiced by the undersigned's withdrawal because: (a) fact discovery will be available until April 8, 2016; (b) expert discovery will be available until April 22, 2016; (c) dispositive and pretrial motions are not due until May 13, 2016; and (d) the Klein/Scott Defendants will have sufficient time to seek new counsel (should they choose to do so) and prepare for trial, which is currently set on the two-week docket commencing October 12, 2016.

4. In accordance with Southern District Local Rule 11.1(d)(3), prior to filing this Motion, the undersigned notified the Klein/Scott Defendants and the Plaintiff's counsel of its intention to withdraw as their counsel.

5. Also in accordance with Southern District Local Rule 11.1(d)(3), the undersigned is providing the following current addresses for the Klein/Scott Defendants:

- a. David Klein's current email address is: [texasusa2@gmail.com](mailto:texasusa2@gmail.com).

- b. David Klein's current physical mailing address is: 9312 Knoll Crest Loop, Austin, TX 78759.
  - c. Derin Scott's current email address is: [derin.scott@yahoo.com](mailto:derin.scott@yahoo.com).
  - d. Derin Scott's current physical mailing address is: 4621 Doris Drive, New Smyrna Beach, FL 32316.
  - e. Shannon Scott's current email address is: [smdscott@me.com](mailto:smdscott@me.com).
  - f. Shannon Scott's current physical mailing address is: 4621 Doris Drive, New Smyrna Beach, FL 32316.
6. Should the Court grant this Motion, and the undersigned be permitted to withdraw as counsel for the Klein/Scott Defendants, all correspondence and pleadings should be directed to the above-referenced addresses.
7. A proposed Order granting the relief requested herein is attached as **Exhibit A**.

WHEREFORE, Fox Rothschild, LLP and its attorneys, including Jeffrey Cohen, Joseph DeMaria, David Greene and Eric Bevan, respectfully request that the Court enter an Order granting leave to withdraw as counsel for Defendants/Counter-Plaintiffs, Derin Scott and David Klein, and Relief Defendant/Counter-Plaintiff, Shannon Scott, relieving it from all further responsibility in this matter, and granting such other and further relief as is just and proper.

Respectfully submitted,

**FOX ROTHSCHILD LLP**

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and Shannon Scott*

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By: s/ Jeffrey Cohen

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(admitted *pro hac vice*)

**and**

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**CERTIFICATE OF SERVICE**

I hereby certify that on **January 8, 2016**, I electronically filed the foregoing with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/ David A. Greene

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