

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

FIRST TIME VIDEOS LLC,

Plaintiff,

v.

DOES 1-76,

Defendants.

Case No. 1:12-cv-20921-JAL-JJO

Judge: Honorable Joan A. Lenard

Magistrate Judge: Honorable John O'Sullivan

FIRST TIME VIDEOS LLC,

Plaintiff,

v.

DOES 1-25,

Defendants.

Case No. 1:12-Civ-21952-JAL-JJO

Judge: Honorable Joan A. Lenard

Magistrate Judge: Honorable John O'Sullivan

MOTION FOR WITHDRAWAL OF COUNSEL
AND
MOTION FOR SUBSTITUTION OF COUNSEL

Joseph Perea, counsel for Plaintiff First Time Videos LLC, hereby moves the Court pursuant to Southern District of Florida Local Rule 11.1(d) for an order permitting him to withdraw as counsel of record for Plaintiff in this action, and Maurice Castellanos seeks permission to be substituted in place of Joseph Perea.

As grounds for this Motion:

1. Joseph Perea has been counsel for the Plaintiff since the commencement of this case.
2. Joseph Perea wishes to withdraw as counsel for the Plaintiff.
3. Plaintiff understands and accepts the withdrawal of Joseph Perea.

4. Because this case is still in the preliminary stages of the proceedings, Plaintiff will not be prejudiced by his withdrawing from this action.

5. Pursuant to Local Rule 11.1(d), Plaintiff and opposing counsel have had the requisite notice of Joseph Perea's intention to withdraw prior to the filing of this motion.

6. Maurice Castellanos is licensed to practice in the Southern District of Florida, and requests that he be designated Counsel of Record on behalf of Plaintiff First Time Videos LLC.

7. Maurice Castellanos, Joseph Perea, and Plaintiff First Time Videos LLC are all in agreement that this substitution is necessary to allow this case to proceed.

THEREFORE, the Court should grant the counsel's Motion to Withdraw as Counsel and Motion for Substitution of Counsel.

DATED: October 11, 2012

Respectfully submitted,

By: /s/ Joseph Perea
Joseph Perea (Bar # 47782)
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By: /s/ Maurice Castellanos
Maurice Castellanos (Bar # 104371)
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 11, 2012, all counsel of record who are deemed to have consented to electronic service are being served a true and correct copy of the foregoing document using the Court's CM/ECF system.

/s/ Maurice Castellanos

Maurice Castellanos