

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 14- 23109-CIV-SCOLA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

PARTNERS IN HEALTH CARE
ASSOCIATION, INC. (also d/b/a/ Partners
In Health Care, Inc.),

GARY L. KIEPER (individually and as officer
or director of Partners In Health Care
Association, Inc.),

UNITED SOLUTIONS GROUP INC. (also
d/b/a Debt Relief Experts, Inc.),

WALTER S. VARGAS (individually and as
an officer or director of United Solutions
Group Inc.),

CONSTANZA GOMEZ VARGAS
(individually and as a director or manager of
United Solutions Group Inc.),

Defendants.

MOTION TO WITHDRAW

GRUMER & MACALUSO, P.A., hereby files this motion to withdraw as counsel for Defendants, PARTNERS IN HEALTH CARE ASSOCIATION, INC. and GARY L. KIEPER, (collectively “DEFENDANTS”) and, in support thereof, state as follows:

1. Representation: The undersigned law firm was retained to represent Defendants PARTNERS IN HEALTH CARE ASSOCIATION, INC. and GARY L. KIEPER (“Defendants”), in the above captioned matter.

2. Irreconcilable Differences: Irreconcilable differences have arisen necessitating the withdrawal of this firm's continued representation in this matter, including but not limited to the Defendants' inability to make adequate financial arrangements for payment of legal services. As result, the undersigned will be unable to effectively and properly continue representing the Defendants herein.

3. Defendants Noticed: The movant has notified the Defendants of their intended withdrawal from the representation, and all Defendants are on notice of this Motion setting.

4. Contact Information for Defendants: The last known mailing address for Gary Kieper, individually, and as representative of Partners In Health Care Association, Inc is: 1519 Oshkosh Avenue, Oshkosh, WI 54902. Mr. Kieper's email address is garykieper@gmail.com.

WHEREFORE, GRUMER & MACALUSO, P.A. moves for an Order permitting its withdrawal in the above captioned matter.

Respectfully submitted,

GRUMER & MACALUSO, P.A.
Attorneys for DEFENDANTS
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By: /s/ Keith T. Grumer
KEITH T. GRUMER
FLORIDA BAR No.: 550416

CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 7.1(a)(3)(A), I hereby certify that counsel for the movant has conferred with Plaintiff's counsel and Receiver's counsel and is authorized to represent that they do not oppose the requested relief.

By: /s/ Keith T. Grumer
KEITH T. GRUMER

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on 13th day of November, 2014, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties either via transmission of Notices of Electronic Filing generated by CM/ECF or vial U.S. Mail for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: /s/ Keith T. Grumer

Service List

Gary Kieper
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