

**IN THE CIRCUIT COURT FOR THE SEVENTEENTH JUDICIAL CIRCUIT COURT
IN AND FOR BROWARD COUNTY, FLORIDA**

Case No.: CACE-24-005243

IN RE:

HERON POND CONDOMINIUM
ASSOCIATION, INC.

Plaintiff,

v.

HERONN POND CONDOMINIUM
ASSOCIATION INC.

Defendants.

MOTION TO WITHDRAW AS COUNSEL

The law firm of Ainsworth & Clancy, PLLC and its attorneys hereby file this Motion to Withdraw as counsel for FEDERATED FOUNDATION TRUST. (“Defendant”) in this case and states the following:

1. Irreconcilable differences have arisen between the Defendant and undersigned counsel thereby making it impossible for undersigned to continue representing the Defendant in this matter.
2. Due to the irreconcilable differences which have arisen between the undersigned and the Defendant, the undersigned will be unable to continue to effectively and properly represent the Defendant herein.
3. The requested withdraw can be accomplished without material adverse effect to the interest of the Defendant.

4. The undersigned counsel has notified the Defendant of the need to seek withdrawal as counsel in this case, and copy of this Motion has been served upon Federated Foundation Trust at the following address:

FEDERATED FOUNDATION TRUST.

Address: 9858 Clint Moore Rd # C11-158, Boca Raton, FL 33496

Telephone: (561) 506-4461

Email: warren@titlelawoffice.com

5. The undersigned counsel asks the Court grant the Defendant a thirty (30) day extension on all orders and a stay of all hearings and proceedings to obtain new counsel.

WHEREFORE, undersigned counsel for FEDERATED FOUNDATION TRUST requests that an Order be entered: (i) allowing the law firm and its attorneys to withdraw as counsel of record, (ii) relieving the law firm and attorneys of any further responsibility in this matter, (iii) granting the Defendant a thirty (30) day extension on all orders and a stay of all hearings and proceedings to obtain new counsel; and (iv) ordering that all further pleadings and papers be sent to the e-mail and physical address listed herein.

Dated: April 3, 2025

Respectfully submitted,

AINSWORTH + CLANCY, PLLC

1826 Ponce De Leon Blvd.

Coral Gables, FL 33134

Telephone: (305) 600-3816

Facsimile: (305) 600-3817

Counsel for Defendant

By: /s/ Ryan Clancy

Ryan M. Clancy, Esq.

Florida Bar No. 117650

Email: ryan@business-esq.com

Email: service1@business-esq.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 3, 2025 a true and correct copy of the foregoing was served via automatically generated e-mail on the Florida e-filing portal to all counsel of record.

By: /s/ Ryan Clancy
Ryan M. Clancy, Esq.