

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

**CASE NO. 1:16-CV-21199-CMA/O'Sullivan**

ANDREA ROSSI et al.,

Plaintiffs,

v.

THOMAS DARDEN, et al.,

Defendants.

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INDUSTRIAL HEAT, LLC and IPH  
INTERNATIONAL B.V.,

Counter-Plaintiffs,

v.

ANDREA ROSSI and LEONARDO  
CORPORATION,

Counter-Defendants,

And

J.M. PRODUCTS, INC., et al.,

Third-Party Defendants.

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**Perlman, Bajandas, Yevoli & Albright, P.L.'s Motion to Withdraw as Counsel for  
Plaintiffs, Andrea Rossi and Leonardo Corporation**

The undersigned counsel, Perlman, Bajandas, Yevoli & Albright, P.L., Paul D. Turner, Esq., and D. Porpoise Evans, Esq. (collectively referred to as "Undersigned Counsel"), requests that this Honorable Court enter an Order permitting their withdraw from this case and from further representation of Plaintiffs, Andrea Rossi and Leonardo Corporation ("Plaintiffs"), and as grounds state the following:

1. Plaintiffs retained Undersigned Counsel to represent it in this case.
2. Pursuant to Rule 4-1.16(b), Florida Rules of Professional Conduct, grounds exist

for this Court to allow Undersigned Counsel's withdraw from representing Plaintiffs.

3. Lead counsel for the Plaintiffs have resigned from the office for Undersigned Counsel and Plaintiffs have moved with them.

4. Plaintiffs' counsel is John Annesser, Esq., Annesser & Chaiken, PLLC, located at 2525 Ponce De Leon Blvd., Suite 625, Coral Gables, Florida 33134.

5. For the Court's convenience, a proposed Order granting this motion is appended hereto.

**Wherefore**, Undersigned Counsel requests this Court enter an order granting their motion to withdraw as counsel for Plaintiffs, relieving Undersigned Counsel of any further obligations in connection with this case, and awarding any such further relief this Court deems just and proper.

Respectfully submitted,

/s/ Paul Turner

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*Counsel for Plaintiffs*

### **Certificate of Service**

**I HEREBY CERTIFY** that on May 9, 2017, I electronically filed the foregoing motion with the Clerk of the Court using CM/ECF. Copies of the foregoing document will be served upon interested counsel 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/ Paul Turner

Paul D. Turner, Esq. (0113743)