

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA

IN RE:

CASE NO. 16-20516-BKC-AJC  
CHAPTER 7

Providence Financial Investments, Inc.,

**MOTION TO WITHDRAW AS COUNSEL OF RECORD  
FOR THE CREDITOR JOYCE OGLE-ELLIS**

**COMES NOW**, the undersigned attorney, Sergio Cabanas, Esquire and Cabanas Law, P.A., hereby files this Motion to Withdraw as Counsel of Record for the Creditor Joyce Ogle-Ellis, in the above chapter 7 case, and respectfully moves this court for an Order removing Cabanas Law P.A. and Sergio Cabanas, Esquire, as counsel of record, and as grounds in support therefore would state as follows:

1. That the Cabanas Law P.A. is presently counsel for the Creditor Joyce Ogle-Ellis.
2. That on or about March 22, 2017 the Creditor Joyce Ogle-Ellis, terminated all services with Cabanas Law P.A. due to irreconcilable differences.
3. It is in the best interest of both attorney and the Creditor that this Court permits Cabanas Law P.A. and Sergio Cabanas, Esquire, to withdraw as attorney on behalf of the above-named Creditor Break Unit, LLC.

WHEREFORE, Cabanas Law P.A. and Sergio Cabanas, Esquire, respectfully request that this Court enter an Order removing them as counsel of record for the Creditor Joyce Ogle-Ellis, and direct that all future pleadings and correspondence be sent directly to the Creditor at 1580 SW 164th Ave. Pembroke Pines, FL 33027.

Dated: May 02, 2017

Cabanas Law P.A.  
Daniel Kent Esquire  
Attorney for Creditor  
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(954) 447-2580  
By: /s/ Sergio Cabanas  
Sergio Cabanas, Esquire  
Florida Bar No. 0898082  
Timothy M. McFarland, Esq.  
Florida Bar No. 93789

I HEREBY CERTIFY THAT I AM ADMITTED TO THE BAR OF THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA AND I AM IN COMPLIANCE WITH THE ADDITIONAL QUALIFICATIONS TO PRACTICE IN THIS COURT SET FORTH IN LOCAL RULE 2090-1(A).

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished on this 2<sup>nd</sup> day of May, 2017, by electronic submission to all parties receiving electronic notices of filings in this case or U.S. Mail to the following:

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(by U.S. Mail)

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Attorney for Debtor  
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Miami, FL 33130  
(by Electronic Service)

Maria Yip  
Chapter 7 Trustee  
2 S. Biscayne Blvd., No. 2690  
Miami, FL 33131  
(by Electronic Service)

United States Trustee  
51 SW 1st Ave., Room 1204  
Miami, FL 33130  
(by Electronic Service)

Creditor Break Unit, LLC  
3350 SW 148th Ave.  
Miramar, FL 33027  
(by U.S. Mail)

Joycelin Ogle-Ellis  
1580 SW 164th Ave.  
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By: /s/ Sergio Cabanas  
Sergio Cabanas, Esq.