

IN THE CIRCUIT COURT OF THE
15TH JUDICIAL CIRCUIT IN AND FOR
PALM BEACH COUNTY, FLORIDA

CASE NO.: 50-2019-CA-013860-XXXX-MB

GABE HOFFMAN,

Plaintiff,

v.

THOMAS SCHOENBERGER,

Defendant.

MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF

COMES NOW the undersigned attorneys for Plaintiff in the above referenced matter, and files this Motion to Withdraw as Counsel for the Plaintiff, Gabe Hoffman, and in support thereof states as follows:

1. On or about September 25, 2019, Kelley Kronenberg ("KK") was retained as counsel for Plaintiff, Gabe Hoffman and the parties entered into a Contract for Representation which outlines the conditions of KK's representation of the Plaintiff.
2. Since that time, KK has represented Plaintiff in this litigation.
3. Recently, irreconcilable differences have arisen between KK and Plaintiff, and there are no circumstances that that would enable KK to competently and zealously represent Plaintiff in this litigation.
4. Pursuant to the executed Contract for Representation, consent has been given by Plaintiff for the firm to withdraw upon such circumstances.
5. In addition, KK has discussed this matter with Plaintiff, who has consented to the firm withdrawing as counsel via an email to KK dated March 24, 2021.

WHEREFORE, Kelley Kronenberg requests that this Court enter an Order allowing it to withdraw as counsel for Plaintiff, Gabe Hoffman, and further stay this entire litigation for 60 days in order for Plaintiff to retain new counsel.

DATED this 29th day of March, 2021.

KELLEY KRONENBERG
Counsel for Plaintiff
10360 West State Road 84
Fort Lauderdale, FL 33324
Telephone No.: (954) 370-9970
Facsimile No.: (954) 382-1988

By: /s/ Dennis S. Klein
DENNIS S. KLEIN
Florida Bar No.: 91767
dklein@kelleykronenberg.com

NOT A CERTIFIED COPY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 29th day of March, 2021, this document was filed using the Florida Courts E-Filing Portal. This document is being served on all counsel and pro se parties of record by the Florida Courts E-Filing Portal, pursuant to and in compliance with Fla. R. Jud. Admin. 2.516. The mailing and electronic addresses are: Thomas Schoenberger, at tstger13@gmail.com, 1726 Willowbrook Drive, Provo, UT 84604, G. Baron Coleman, Esq. at baron@baroncoleman.com and baroncoleman@gmail.com, Baron Coleman Law Firm, Three South Jackson Street, P.O. Box 789, Montgomery, AL 36101-0789 and Gabe Hoffman, Plaintiff, at ghoff1995@gmail.com, 12210 Banyan Road, North Palm Beach, FL 33408.

By: /s/ Dennis S. Klein
DENNIS S. KLEIN

NOT A CERTIFIED COPY