

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

IRA KLEIMAN, as the personal representative
of the Estate of David Kleiman, and
W&K INFO DEFENSE RESEARCH, LLC

Plaintiffs,

v.

CRAIG WRIGHT

Defendant.

CASE NO.: 9:18-cv-80176-BB

MOTION FOR LEAVE TO WITHDRAW KYLE ROCHE

Pursuant to Local Rule 11.1(d)(3)(A), undersigned counsel respectfully moves to withdraw Kyle Roche as counsel for Plaintiffs Ira Kleiman as personal representative for the Estate of David Kleiman and W&K Info Defense Research, LLC (collectively “Plaintiffs”) in this matter.

In support of this motion, undersigned states as follows:

1. Kyle Roche filed a motion to appear *as pro hac vice* counsel for Plaintiffs on February 28, 2018.
2. Kyle Roche’s *pro hac vice* motion was granted on February 28, 2018.
3. Kyle is no longer with the firm Roche Freedman LLP n/k/a Freedman Normand Friedland LLP and no longer representing Plaintiffs.
4. Devin (Velvel) Freedman, Joseph Delich and Stephen Lagos of Freedman Normand Friedland LLP and Andrew S. Brenner of Boies Schiller Flexner LLP will continue to represent Plaintiffs. Their current mailing addresses are listed below and remain unchanged.
5. As required by Local Rule 7.1(a)(2), a proposed order is attached as Exhibit A.

WHEREFORE, undersigned counsel respectfully requests that the Court grant Kyle Roche leave to withdraw as an attorney of record in this matter.

Dated: January 17, 2023

Respectfully submitted,

By: /s/ Devin (Velvel) Freedman

Devin (Velvel) Freedman, Esq.
FREEDMAN NORMAND FRIEDLAND LLP
1 SE 3rd Avenue, Suite 1240
Miami, Florida 33131
Telephone: (305) 753-3675
Facsimile: (646) 392-8842
vel@fnf.law

Joseph Delich, Esq. (*admitted pro hac*)
Stephen Lagos, Esq. (*admitted pro hac*)
FREEDMAN NORMAND FRIEDLAND LLP
99 Park Avenue, Suite 1910
New York, NY 10016
jdelich@fnf.law
slagos@fnf.law

Andrew S. Brenner
BOIES SCHILLER FLEXNER LLP
100 SE 2nd Street, Suite 2800
Miami, Florida 33131
abrenner@bsflp.com

*Counsel to Plaintiff Ira Kleiman as
Personal Representative of the Estate of
David Kleiman and W&K Info Defense
Research, LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 17, 2023 a true and correct copy of the foregoing was filed with CM/ECF, which caused a copy to be served on all counsel of record.

/s/ Devin (Velvel) Freedman
Devin (Velvel) Freedman