

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

LARRY KLAYMAN,

Plaintiff,

vs.

INFOWARS, LLC; FREE SPEECH SYSTEMS,
LLC; ALEX E. JONES; DAVID JONES;
OWEN SHROYER; and ROGER STONE,

Defendants.

Case No. 0:20-cv-61912-AMC

**MOTION TO WITHDRAW AS
ATTORNEYS OF RECORD AND
FOR EXTENSION OF TIME**

Pursuant to LR 11.1 (d)(3) and R. Regulating Fla. Bar 4-1.16, Attorney Marc J. Randazza respectfully moves this Court for an Order granting his withdrawal as counsel of record for Defendants InfoW, LLC, f/k/a Infowars, LLC, Free Speech Systems, LLC, Alex E. Jones, and Owen Shroyer (the “Represented Defendants”). Additionally, Movant respectfully moves this Court for a 60-day extension of time for Represented Defendants to serve and file their Motion for Attorneys’ Fees pursuant to LR 7.3. In support thereof, undersigned counsel states:

1. Undersigned counsel was retained to represent and defend the Represented Defendants in this action.

2. Although this case has been dismissed, limited post-judgment matters will still require participation of the Represented Defendants, including seeking reimbursement of their attorneys’ fees.

3. However, there has been a breakdown of the attorney-client relationship between undersigned counsel and the Represented Defendants.

4. R. Regulating Fla. Bar 4-1.16(b) allows an attorney to withdraw from representing a client if:

- (1) withdrawal can be accomplished without material adverse effect on the interests of the client; ...

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- (3) the client fails substantially to fulfill an obligation to the lawyer regarding the lawyer's services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled; ... or
- (5) other good cause for withdrawal exists.

R. Regulating Fla. Bar 4-1.16(b).

5. Pursuant to LR 11.1 (d)(3)(A), mailing addresses for the Represented Defendants are attached as **Exhibit A**.

6. Here, withdrawal can be accomplished without material adverse effect on the interests of the Represented Defendants. Specifically, this Court has entered a final judgment against Plaintiff Larry Klayman in this action, releasing the Defendants from liability related to this action.

7. Further, to avoid any undue prejudice, Movant requests that this Court grant Represented Defendants an extension of 60 days to serve a Motion for Attorneys' Fees beyond the 30-day deadline to serve such a Motion pursuant to LR 7.3(b), and for an extension of 60 days to file a Motion for Attorneys' Fees beyond the 60-day deadline pursuant to LR 7.3(a)(1).

8. Such an extension will not prejudice any party and will allow the Represented Defendants time to secure alternative counsel.

9. Good cause additionally exists to allow for the withdrawal of undersigned counsel because Represented Clients have failed to substantially fulfill an obligation to undersigned counsel despite being given reasonable warnings that undersigned counsel will withdraw unless the obligation was fulfilled.

10. Specifically, there has been a breakdown in communication between undersigned counsel and the Represented Defendants, and continued representation of the Represented Defendants by undersigned counsel is no longer tenable.

WHEREFORE, Attorney Marc J. Randazza moves this Court for an Order granting his withdrawal as counsel of record for the Represented Defendants and a 60-day extension of time for Represented Defendants to serve and file their Motion for Attorneys' Fees pursuant to LR 7.3.

PRE-FILING CONFERENCE CERTIFICATION

Pursuant to LR 7.1(a)(3) undersigned counsel contacted the Represented Defendants by email and by letter on April 15, 2022. Represented Defendants have not responded to requests to meet and confer relating to these issues.

On April 18, 2022, undersigned counsel's office reached out to Plaintiff Larry Klayman, proceeding *pro se* in this matter, to ascertain his position on this Motion. Mr. Klayman opposes any extension of time.

Dated: April 18, 2022.

Respectfully submitted,

/s/Marc J. Randazza
Marc J. Randazza (FL Bar No. 625566)
RANDAZZA LEGAL GROUP, PLLC
2764 Lake Sahara Drive, Suite 109
Las Vegas, NV 89117
Telephone: 702-420-2001
ecf@randazza.com

Attorneys for Defendants
Infowars, LLC; Free Speech Systems, LLC;
Alex E. Jones; and Owen Shroyer

Case No. 0:20-cv-61912-AMC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 18, 2022, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document being served via transmission of Notices of Electronic Filing generated by CM/ECF. Further, a true and correct copy of the foregoing document is being served on Defendants Infowars, LLC, Free Speech Systems, LLC, Alex E. Jones, and Owen Shroyer via U.S.

Mail to the addresses below:

Infowars, LLC
3005 S. Lamar Blvd, Ste. D109 317
Austin, TX 78704

Free Speech Systems, LLC
PO Box 19549
Austin, TX 78760

Alex Jones
PO Box 19549
Austin, TX 79760

Owen Shroyer
7312 E Ben White Blvd
Austin, TX 78741

/s/ Marc J. Randazza
Marc J. Randazza

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