

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

DOUGLAS HANDSHOE

PLAINTIFF

VS.

CIVIL ACTION NO. 1:13cv251-LG-JMR

**AARON F. BROUSSARD, DANIEL ABEL,
CHARLES LEARY, VAUGHN PERRET,
CHRIS YOUNT, TROUT POINT LODGE
LIMITED, NOVA SCOTIA ENTERPRISES, LLC**

DEFENDANTS

MOTION TO WITHDRAW AS LOCAL COUNSEL

COMES NOW, Kahn Swick & Foti, LLC, and files its Motion to Withdraw as Local Counsel for Defendant Nova Scotia Enterprises, LLC, and in support of said Motion shows unto the Court the following:

1. The law firm of Kahn Swick & Foti, LLC is local counsel for Defendant Nova Scotia Enterprises, LLC in the above-styled and numbered cause.
2. Defendant Nova Scotia Enterprises, LLC and Kahn Swick & Foti, LLC mutually request that the Court allows the withdrawal of Kahn Swick & Foti, LLC as local counsel for Defendant.
3. In the event the Court finds that this Motion should be granted, Lead counsel for Defendant Nova Scotia Enterprises, LLC, Ronald J. Vega, Esq., will endeavor to associate with a substitute resident attorney pursuant to Rule 83.1 of the Local Uniform Civil Rules of the United States Courts for the Southern District of Mississippi within thirty (30) days of such an order.
4. Defendant Nova Scotia Enterprises, LLC will not be prejudiced by the withdrawal of Kahn Swick & Foti, LLC as local counsel for Defendant. There are no immediate deadlines

requiring local counsel's participation and, thus, Defendant will have sufficient time to engage substitute local counsel. Moreover, Defendant is still currently represented in this matter by lead counsel Ronald J. Vega, Esq., who is admitted *pro hac vice* in this matter.

WHEREFORE, Movant prays that it be allowed to withdraw as local counsel for Defendant Nova Scotia Enterprises, LLC.

Respectfully submitted, this the 9th day of September, 2013,

/s/ Craig J. Geraci, Jr.
CRAIG J. GERACI, JR.
Mississippi Bar #103268
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Local Counsel for Defendant Nova Scotia Enterprises, LLC

/s/ Ronald J. Vega
RONALD J. VEGA
(admitted *pro hac vice*)
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Lead Counsel for Defendant Nova Scotia Enterprises, LLC

CERTIFICATE OF SERVICE

I hereby certify that on September 9th, 2013, I electronically filed the foregoing with the Clerk of Court using the ECF system, and I hereby certify that I have e-mailed the document to the following:

Douglas Handshoe
214 Corinth Drive
Bay St. Louis, MS 39520
Email: earning04@gmail.com

/s/ Craig J. Geraci, Jr.
Craig J. Geraci, Jr.