

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

In re

THE CENTER FOR SPECIAL NEEDS
TRUST ADMINISTRATION, INC.,

Case No.: 8:24-bk-00676-RCT
Chapter 11

Debtor.

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**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL
FOR BOSTON FINANCE GROUP, LLC and LEO J. GOVONI**

**NOTICE OF OPPORTUNITY TO
OBJECT AND REQUEST FOR HEARING**

If you object to the relief requested in this paper you must file a response with the Clerk of Court at Sam M. Gibbons US Courthouse, 801 N Florida Ave, Suite 555, Tampa, FL 33602 and, if the moving party is not represented by an attorney, mail a copy to the moving party at Lara Roeske Fernandez, Trenam Kemker Scharf Barkin Frye O'Neill and Mullis PA, 101 E Kennedy Blvd, Ste 2700, Tampa, FL 33601 within 14 days from the date of the attached proof of service, plus an additional three days if this paper was served on any party by U.S. Mail.

If you file and serve a response within the time permitted, the Court will either notify you of a hearing date or the Court will consider the response and grant or deny the relief requested in this paper without a hearing. If you do not file a response within the time permitted, the Court will consider that you do not oppose the relief requested in the paper, and the Court may grant or deny the relief requested without further notice or hearing.

You should read these papers carefully and discuss them with your attorney if you have one. If the paper is an objection to your claim in this bankruptcy case, your claim may be reduced, modified, or eliminated if you do not timely file and serve a response.

Lara Roeske Fernandez, Esq., Eric S. Koenig, Esq., and William A McBride, Esq. of Trenam, Kemker, Scharf, Barkin, Frye, O'Neill & Mullis, P.A. ("**Trenam**") moves the Court for permission to withdraw as counsel of record for Boston Finance Group, LLC and Leo J. Govoni, and in support states as follows:

1. Trenam is counsel of record for Boston Finance Group, LLC and Leo J. Govoni in this matter.

2. Trenam seeks to withdraw as counsel of record for Boston Finance Group, LLC and Leo J. Govoni as irreconcilable differences have arisen between Trenam and Boston Finance Group, LLC and Leo J. Govoni.

3. Boston Finance Group, LLC and Leo J. Govoni consent to the withdrawal of Trenam as its counsel in the above-captioned action.

4. As of the date of this motion, Trenam has not been advised as to whether Boston Finance Group, LLC and Leo J. Govoni will be retaining substitute counsel.

5. Further correspondence should be addressed to: Boston Finance Group, LLC, 12707 49th St N, Suite 900, Clearwater, FL 33762 and Leo J. Govoni, 12707 49th St N, Suite 200, Clearwater, FL 33762.

6. Pursuant to Local Rule 2091-2, a copy of this Motion to Withdraw as Counsel (the “**Motion**”) will be served on the last known address for Boston Finance Group, LLC, 12707 49th St N, Suite 900, Clearwater, FL 33762, Leo J. Govoni, 12707 49th St N, Suite 200, Clearwater, FL 33762, the Debtor The Center for Special Needs Trust Administration, Inc., 12425 28th St N, Saint Petersburg, FL 33716, Debtor’s Counsel Daniel R Fogarty, Stichter, Riedel, Blain & Postler PA, 110 East Madison St, Suite 200, Tampa, FL 33602, Patrick Mosley, Hill, Ward, Henderson, 101 E. Kennedy Blvd, Suite 3700, PO Box 2231, Tampa, FL 33602, the Trustee Michael Goldberg, 201 East Las Olas Blvd, Suite 1800, Fort Lauderdale, FL 33301, and the US Trustee- Tampa, Timberlake Annex, Suite 1200, 501 E Polk Street, Tampa, FL 33602.

7. This Motion is not filed for any improper purposes or to delay this action.

WHEREFORE, Trenam requests that this Court: 1) permit it to withdraw as counsel of

record for Boston Finance Group, LLC and Leo J. Govoni in this action; 2) relieve Trenam from any further responsibilities in this matter; 3) allow Boston Finance Group, LLC and Leo J. Govoni additional time to obtain new counsel; and 4) award such other relief the Court deems appropriate under the circumstances.

Dated: December 10, 2024

/s/ Lara Roeske Fernandez
LARA ROESKE FERNANDEZ
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WILLIAM A McBRIDE
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*Counsels for Boston Finance Group, LLC
and Leo J. Govoni*

CERTIFICATE OF SERVICE

I hereby certify that on December 10, 2024 a true and correct copy of the foregoing has been served via CM/ECF on all CM/ECF registered participants and by U.S. First Class Mail to: Boston Finance Group, LLC, 12707 49th St N, Suite 900, Clearwater, FL 33762, and Leo J. Govoni, 12707 49th St N, Suite 200, Clearwater, FL 33762.

/s/ Lara Roeske Fernandez
Attorney