

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 16-CV-21301-GAYLES**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

ARIEL QUIROS, *et al.*,

Defendants, and

JAY CONSTRUCTION MANAGEMENT, INC., *et al.*,

Relief Defendants.

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**MOTION TO WITHDRAW AS COUNSEL OF RECORD  
FOR DEFENDANT ARIEL QUIROS**

Pursuant to Local Rule 11.1(d)(3), Scott B. Cosgrove and James R. Bryan of the law firm of León Cosgrove, LLC, and attorneys admitted *pro hac vice* David Gordon, John Durrant, Jean Pierre Nogues, Mark T. Hiraide, and Jaclyn H. Grodin of the law firm of Mitchell Silberberg & Knupp LLP, respectfully request the entry of an Order permitting their withdrawal from the representation of Defendant Ariel Quiros in the above-referenced matter. In support, the undersigned state as follows:

1. Defendant Ariel Quiros has terminated the undersigned law firms and instructed them to do no further work on his matters.
2. Defendant Quiros has further retained Melissa D. Visconti of the law firm of Damian & Valori LLP to represent him (D.E. 294).

3. All future pleadings, filings, and/or correspondence relating to this matter should be directed to Melissa D. Visconti of the law firm of Damian & Valori LLP at [mvisconti@dvllp.com](mailto:mvisconti@dvllp.com), 1000 Brickell Avenue, Suite 1020, Miami, Florida 33131.

4. This motion is not filed for the purposes of delay, and undersigned counsel has taken all steps reasonably practicable to protect the client's interests.

WHEREFORE, Scott B. Cosgrove and James R. Bryan of the law firm of León Cosgrove, LLC, and attorneys admitted *pro hac vice* David Gordon, John Durrant, Jean Pierre Nogues, Mark T. Hiraide, and Jaclyn H. Grodin of the law firm of Mitchell Silberberg & Knupp LLP, respectfully request the entry of an Order permitting their withdrawal from the representation of Defendant Ariel Quiros in the above-referenced matter and to be relieved of any further responsibility of the handling of this matter. A proposed order is attached hereto and will also be submitted via e-mail to the Court as prescribed by Section 3I(6) of the CM/ECF Administrative Procedures.

Dated: March 29, 2017

Respectfully submitted,

By: s/ James R. Bryan

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*Counsel for Defendant Ariel Quiros*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this on March 29, 2017, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing documents are being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in the manner stated in the service list attached.

*s/ James R. Bryan* \_\_\_\_\_  
James R. Bryan

**SERVICE LIST**  
**US District Court, Southern District of Florida**  
**Case No.: 16-cv-21301-DPG**

*Securities and Exchange Commission v. Ariel Quiros, et al.*

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