

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT IN AND FOR PINELLAS  
COUNTY, FLORIDA  
CIVIL DIVISION

BAY AREA LENDING SERVICES LLC,  
a Florida limited liability company,

Plaintiff,

CASE NO: 23-008560-CI

vs.

FAMILY INTERNATIONAL HOME  
BUILDERS LLC, a Florida limited liability  
company, TATIANA MURRAY, individually,  
RANDELL J. WALDEN, SR., individually, F  
REDDIE MURRAY, individually,  
ALPHONSO DEROSIERS, individually, and  
MORRISSEY & MORRISSEY ENTERPRISES,  
LLC, a Florida limited liability company,

Defendants \_\_\_\_\_ /

**MOTION TO WITHDRAW AS COUNSEL**

COMES the Range Law Firm (the “Firm”) by and through Tamioka Range Esq. (“Counsel”), and files this Motion to Withdraw the Firm and Counsel as attorney of record for FAMILY INTERNATIONAL HOME BUILDERS LLC, TATIANA MURRAY, RANDELL J. WALDEN, SR., FREDDIE MURRAY, and ALPHONSO DEROSIERS, (the “Defendants”) and states the following in support:

1. It has come to the attention of the Counsel representing Defendants that the Defendants have failed substantially to fulfill certain obligations to Counsel regarding Counsel’s services and has been given reasonable warning that Counsel would withdraw unless the obligations were fulfilled.
2. Defendants failure to comply with the fee agreement has adversely affected Counsel’s ability to zealously represent the Defendants.
3. It has come to the attention of Counsel representing Defendants that, representation will be materially limited by personal interest of Counsel and the Firm because Counsel does not reasonably believe that she will be able to provide competent and diligent representation under the current circumstances.

4. It has also come to the attention of Counsel representing Defendants that Counsel's representation has resulted in an unreasonable financial burden on Counsel and the Firm.
5. Therefore, Counsel request that they be allowed to withdraw as attorney of record and that Defendant be allowed 45 days in which to obtain new counsel.

WHEREFORE, CONSIDERED, Counsel request that they be allowed to withdraw as attorney of record and that Defendant be allowed 45 days in which to obtain new counsel.

Respectfully Submitted,

/s/ Tamioka Range  
Tamioka Range, Esq.  
The Range Law Firm  
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Attorney for Defendants

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the Motion to Withdraw as Counsel has been filed electronically via the Florida E-Portal to all counsel of record and furnished electronically to all Defendants to the emails listed below, on this 8<sup>th</sup> day of August 2024.

/s/ Tamioka Range  
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