

IN THE SUPREME COURT OF FLORIDA
CASE NO. SC21-1255

SAMANTHA ELAINE TSUJI AND
CRYSTAL IVY WILLIAMS,

Petitioners,

vs.

L.T. Case No. 1D20-0901;
2018-CA-000218

H. BART FLEET, AS THE DULY
APPOINTED PERSONAL
REPRESENTATIVE OF THE
ESTATE OF THOMAS E.
MORTON, JR., DECEASED,
AND THE LEWIS BEAR
COMPANY,

Respondents.

_____ /

MOTION TO WITHDRAW AS COUNSEL

Pursuant to Florida Rule of Appellate Procedure 9.440, the undersigned, Meredith A. Ross, respectfully requests that this Court enter an order granting her leave to withdraw as co-counsel for Petitioners, Samantha Elaine Tsuji and Crystal Ivy Williams. As grounds for the motion, the undersigned states as follows:

1. On April 15, 2022, Meredith A. Ross of Creed & Gowdy, P.A. is changing firms.

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2. Bryan S. Gowdy and Dimitrios A. Peteves of Creed & Gowdy, P.A. will continue to represent Petitioners as appellate counsel.

3. Coy H. Browning of Browning Law Firm, P.A. will continue to represent Petitioners as trial counsel.

4. Petitioners' last known addresses, telephone numbers, and e-mail addresses are: Samantha Elaine Tsuji, c/o Coy Browning, Browning Law Firm, P.A., 418 Racetrack Road NE, Suite B, Fort Walton Beach, Florida 32547, (850) 864-4384, coy@browninglawfirm.com; and Crystal Ivy Williams, c/o Coy Browning, Browning Law Firm, P.A., 418 Racetrack Road NE, Suite B, Fort Walton Beach, Florida 32547, (850) 864-4384, coy@browninglawfirm.com.

5. Pursuant to Florida Rule of Appellate Procedure 9.440(b), a copy of this motion will be served on the clients and on adverse parties.

WHEREFORE, this Court should grant Meredith A. Ross leave to withdraw as co-counsel for Petitioners, Samantha Elaine Tsuji and Crystal Ivy Williams.

CREED & GOWDY, P.A.
/s/ Meredith A. Ross

Meredith A. Ross

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing notice was filed with the Clerk of Court on April 7, 2022, via the Florida Courts E-Filing Portal, which will serve a notice of electronic filing to all counsel of record.

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*Counsel for H. Bart Fleet as the
duly appointed Personal
Representative of the Estate of
Thomas E. Morton, Jr., deceased*

I HEREBY CERTIFY that Pursuant to Florida Rule of Appellate Procedure 9.440(b), a true and correct copy of the foregoing has been furnished via email to:

Samantha Elaine Tsuji

Crystal Ivy Williams

c/o

Coy H. Browning

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Trial Counsel for Petitioners

/s/ Meredith A. Ross

Attorney