

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT, IN AND FOR
MIAMI-DADE COUNTY

COMPLEX BUSINESS DIVISION

CASE NO. 2025-7702-CA-01

MICHAEL STERN and JDS Development
Group, LLC,

Plaintiffs,

v.

JOHN DOE,

Defendant.

MOTION TO WITHDRAW AS COUNSEL

The law firm of Stearns Weaver Miller Weissler Alhadeff & Sitterson (“the Firm”) and attorneys Grace L. Mead (Florida Bar No. 89896) and Joseph Onorati (FL Bar No. 92938), pursuant to Rule 2.505(f)(1), Florida Rules of Judicial Administration, hereby file this Motion to Withdraw as counsel of record for Plaintiff Michael Stern and JDS Development Group, LLC, and state the following:

1. Since begin retained, the Firm has provided significant legal services to Mr. Stern and JDS (the “Plaintiffs”) in the above-captioned matter. There are irreconcilable differences between the Firm and Plaintiffs, including Plaintiffs’ failure to comply with the terms of engagement, that necessitate the filing of the instant Motion.

2. Plaintiffs have been notified of the circumstances that prompted the filing, but irreconcilable differences nevertheless remain.

3. The signature block of the Complaint indicated that pro hac vice applications would be forthcoming for Thomas A. Clare, David Sillers, and Jon Kaiman of the firm Clare Locke LLP for Plaintiffs, but no such applications were filed and so there is no need for them to withdraw.

4. The Defendant John Doe is an individual who drafted, edited, registered, published, or aided and abetted the drafting, editing, registration, or publication of JDSpulse.com and affiliated social media pages. Plaintiff has not yet amended this Complaint to allege the true names and capacities of Doe, and so there is not yet a named defendant or any opposing counsel representing any defendant with whom to confer about this motion.

5. This matter is not set for Trial. Therefore, the withdrawal of undersigned counsel will not prejudice any party to this proceeding, and must be granted. *See King & Spalding LLP v. The Residences at the bath Club Condo. Assoc., Inc.*, 413 So. 3d 950 (Fla. 3d DCA 2025).

6. Upon withdrawal of undersigned counsel, all pleadings and correspondence shall be furnished to Mr. Stern and JDS directly to Michael Stern at JDS Development, 120 NE 27th Street, Miami, FL 33137 and at mstern@jdsdevelopment.com and (646) 625-3649 until such time as alternate counsel appears in this matter.

7. Accordingly, it is respectfully requested that this Court grant this Motion for Ms. Mead, Mr. Onorati, and the law firm of Stearns Weaver Miller to withdraw as counsel for Mr. Stern and JDS, thereby terminating their appearance in this matter on behalf of Mr. Stern and JDS and relieving them of all obligations as counsel of record to Mr. Stern and JDS here.

8. A proposed Order is attached hereto as **Exhibit A**.

WHEREFORE, it is respectfully requested that this Honorable Court terminate Ms. Mead, Mr. Onorati, and the law firm of Stearns Weaver Miller as attorneys of record for Mr. Stern and JDS, relieving them of all obligations as counsel of record to Mr. Stern and JDS, and entering an order granting Mr. Stern and JDS thirty (30) days to find substitute counsel.

Date: December 19, 2025

Respectfully submitted,

By: /s/ Grace L. Mead

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via the Florida e-filing portal this 19th day of December 2025 using the Florida Courts E-Portal.

By:/s/ Grace L. Mead
GRACE L. MEAD

EXHIBIT A

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CASE NO. 2025-7702-CA-01

MICHAEL STERN and JDS Development
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Plaintiffs,

v.

JOHN DOE,

Defendant.

ORDER GRANTING MOTION TO WITHDRAW

THIS CAUSE HAVING come before this Court on the ____ day of _____ 2025, on Plaintiffs' Motion to Withdraw as Counsel for MICHAEL STERN and JDS Development Group, LLC, [hereinafter "CLIENT"], and appropriate notice having been given, it is hereby,

ORDERED AND ADJUDGED as follows:

- 1) The Motion to Withdraw is **GRANTED**.
- 2) Movant shall mail a copy of this order to CLIENT forthwith.
- 3) **Within 30 days** from the date of this order, CLIENT shall either:
 - a. Retain new counsel and have that counsel file a written appearance with the Clerk of the Court; OR
 - b. File a written notice with the Clerk of the Court advising that CLIENT will represent himself/herself. *[Note: If CLIENT is a corporation, trustee or a trust, personal representative of an estate, or otherwise named in a representative capacity, CLIENT must retain counsel.]*
- 4) **SELF-REPRESENTED PARTIES AS WELL AS NEW COUNSEL ARE RESPONSIBLE FOR REGISTERING AN EMAIL WITH THE STATE E-PORTAL IN ORDER TO RECEIVE NOTICES, ORDERS, AND EMAIL NOTIFICATION WITH HEARING INFORMATION SUCH**

AS ZOOM LOG-IN INFORMATION

(<https://www.myflcourtaccess.com/default.aspx>). Any party or counsel may sign up for text alerts IN ADDITION TO proper registration on the portal. If a party is not able to check an email account regularly, but has a working phone with text capability, the Court strongly encourages signing up for text alerts (<https://www.jud11.flcourts.org/Programs-and-Services/Online-Services/Hearing-Text-Alerts>).

- 5) Failure to comply with the preceding paragraph will create a presumption that CLIENT no longer wishes to participate in this lawsuit and the Court may *sua sponte* or on motion of opposing party impose sanctions against CLIENT. Sanctions may include the imposition of fees and costs, striking of pleadings, entry of default, and dismissal with prejudice.
- 6) In the interim, CLIENT is required to comply with orders/notices requiring CLIENT'S appearance in court; any pending order requiring compliance is stayed for thirty (30) days.
- 7) CLIENT may be served at the following address:

Michael Stern
JDS Development Group, LLC
120 NE 27th Street
Miami, FL 33137
mstern@jdsdevelopment.com

and contacted via telephone at the following number(s):

(646) 625-3649

- 8) CLIENT is responsible for updating the address by filing a notice of new address with the Clerk of the Court and providing a copy to opposing counsel. Failure to update the address shall constitute a waiver of any defenses due to lack of notice.
- 9) **THIS ORDER DOES NOT CHANGE ANY CURRENT TRIAL SETTING IN THIS CASE.**
- 10) **THIS ORDER DOES NOT CANCEL ANY PENDING FORECLOSURE SALE DATE.**

DONE and ORDERED in chambers in Miami-Dade County, Florida
this ____ day of _____ 2025.

THOMAS J. REBULL
Circuit Judge

cc: All parties and counsel of record.