

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT,
IN AND FOR PALM BEACH COUNTY, FLORIDA

CASE NO.: 50-2018-CA-002317

WALTER E. SAHM and
PATRICIA SAHM,

Plaintiffs,

BERNSTEIN FAMILY REALTY, LLC and
ALL UNKNOWN TENANTS

Defendants

/

**EXPEDITED MOTION TO WITHDRAW AS ATTORNEY WITHOUT HEARING FOR
ALL BERNSTEIN DEFENDANTS AND DEBTOR BFR**

INGER GARCIA, as attorney for Defendant Eliot I. Bernstein, Candice Bernstein, Josh, Daniel and Jacob Bernstein, and BFR “Bernstein Family Realty,” hereby files this Expedited Motion for Withdrawal as Attorney without Hearing and hereby alleges as follows:

1. Inger Garcia, attorney in this proceeding for Eliot I. Bernstein, BFR, Candice Bernstein and the three Bernstein owners of BFR, Josh, Daniel and Jacob Bernstein, and request an expedited immediate order allowing withdrawal.
2. The client Eliot Bernstein initially terminated the undersigned but now does not consent to this withdrawal for the other related parties. It is an extreme financial burden on the undersigned to continue to represent BFR or the other individuals as a withdrawal must be granted.
3. This is an urgent timely request as the 15-day window for disqualifications and rehearing will expire and the undersigned will not file in this case due to the Order entered prohibiting filings as well as this court holding her jointly and severally liable for Defendants’

attorney's fees. An appeal will ensue for the undersigned as to her portion of the order and the Defendants will determine on their own their future course of action.

4. The Defendants will hire new counsel or continue pro-se.
5. I file this Expedited Motion under Fl. R. Gen. Prac. Jud. Admin. 2.505(f)(1) Termination of Attorneys and R. Regul. Fl. Bar 4-1.16 (b) (4) and (5); as this case has created a massive financial burden on the undersigned and good cause exists for termination as attorney. The clients Eliot I. Bernstein, Candice Bernstein, Josh Bernstein, Daniel Bernstein and Jacob Bernstein, and Bernstein Family Realty "BFR" are fully informed, knowledgeable of this motion and the need for an immediate order to be issued Expedited Without Hearing for the withdrawal as attorney of record on their behalf in this foreclosure action.
6. On March 6, 2025, under DE No. 314 this Court issued an Order suggesting Fraud on the Court and other Sanctions including monetary sanctions "jointly and severally" against myself and client Eliot Bernstein and BFR for all reasonable costs and attorney's fees and other relief for a window of time. The undersigned cannot incur any additional personal liability for these defendants as the irreconcilable differences of opinion as to forward strategy has arisen. The undersigned is also making it clear that she firmly believes the Order is in error, however she will not file in this case and risk being further sanctioned.
7. The undersigned will provide the proof of fraud to the relevant courts as she remains convinced that the plaintiffs are the only ones who committed any wrongdoing in this case as well as all the other cases involved related to this matter.
8. Client Eliot Bernstein has expressly requested that the undersigned withdraw as his attorney of record and because of the potential conflict created by this Order, this is the

best course of action and serves as good cause for immediate withdrawal at Mr. Bernstein's request. The undersigned cannot remain as counsel for any defendants due to the order entered in this matter.

9. The undersigned cannot continue to represent BFR and or the other family members individually due to financial burden.
10. This motion and action in no way is in violation of this Court's Order under DE No. 314 of March 6, 2025, and is reasonable and proper under the circumstances and was expressly requested by Mr. Bernstein on his own behalf to be filed and filed as Expedited Waiving the right to any Hearing.
11. Because of the status of the proceeding and deadlines the undersigned cannot and will not meet, this motion for withdrawal should be treated with expedited relief granting the withdrawal.
12. Eliot Bernstein requested this motion be filed initially and he is fully aware of the motion.
13. The undersigned affirms under R. Regul. Fl. Bar 4-1.16 (d) that she has taken all reasonable steps necessary for the Protection of Client's Interests by having this order signed quickly so the clients can retain counsel or continue pro-se and the undersigned has advised the clients of the 15 day and 30 day deadlines.
14. Consistent with the requirements of Fl. R. Gen. Prac. Jud. Admin. 2.505 (f) (1) the Client's last known address is: 2753 NW 34th Street, Boca Raton, Florida 33434 which is the address for the real estate that is the subject of this action, Client's phone number 561-886-7628, and the client's email addresses are iviewit@iviewit.tv and iviewit@gmail.com. BFR can be served at that address also, as Eliot Bernstein is a managing member and resides in

the home. The email addresses for all the other clients as current active members based on the last annual meeting is: Candice Bernstein: tourcandy@gmail.com; Eliot Bernstein: iviewit@iviewit.tv and iviewit@gmail.com; Josh Bernstein; telenetjosh@gmail.com ; Jacob Bernstein: telenetjake@gmail.com; and Daniel Bernstein: dannymojo1@gmail.com. The undersigned has never represented Kevin Hall so there is no need to include him in this withdrawal.

15. Eliot Bernstein, BFR, Candice Bernstein and Josh, Daniel and Jake Bernstein are fully aware, knowledgeable of this withdrawal as counsel. The undersigned remains as counsel for Josh, Jacob and Daniel Bernstein in other matters as they are completely innocent on any allegations of wrongdoing in this matter. Candice Bernstein is also completely innocent of any wrongdoing in this matter and they are not part of any sanctions orders herein.

16. The undersigned retains and retaining lien and charging lien on the file.

WHEREFORE, it is respectfully prayed for an expedited Order granting the withdrawal as attorney of Record for Eliot I. Bernstein, BFR “Bernstein Family Realty,” Candice Bernstein, Josh Bernstein, Jacob Bernstein, and Daniel Bernstein and due to the time constraint is requesting a waiver of hearing, and to enter a retaining lien and charging lien on this file, and for such other and further relief as may be just and proper.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true copies of the foregoing document were filed electronically with the Clerk of Court through the Florida Courts e-filing Portal, which shall serve an electronic copy by e-mail on counsel of record this 17th day of March 2025.

By: /s/ Inger M. Garcia

Inger M. Garcia, Esquire

E-Portal List from E-Filing

Respectfully submitted,

/s/Inger Garcia, Esq.

Inger M. Garcia, Esq.

Florida Litigation Group

Counsel for Defendants BFR and Eliot, Candice, Josh, Daniel and Jacob Bernstein

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E-Portal List from E-Filing

CONSENT TO WITHDRAWAL AND LIENS (not executed)

I, the undersigned consent to the withdrawal of Inger Garcia, Esq on this matter on an expedited basis without hearing as well as a retaining and charging lien on the file.

_____ dated: March 10, 2025
Candice Bernstein: tourcandy@gmail.com;

_____ dated: March 10, 2025
Eliot Bernstein: iviewit@iviewit.tv and iviewit@gmail.com;

_____ dated: March 10, 2025
Josh Bernstein; telenetjosh@gmail.com ;

_____ dated: March 10, 2025
Jacob Bernstein: telenetjake@gmail.com ;

_____ dated: March 10, 2025
Daniel Bernstein: dannymojo1@gmail.com .