



CIRCUIT COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
SOUTH ALABAMA MEDICAL &	)	Civil Action No.:
REHAB LLC, et al.,	)	02-CV-2025-901925.00
	)	
Defendants.	)	

MOTION TO WITHDRAW

Cole R. Gresham hereby moves this Court to allow him to withdraw as counsel of record for all represented Defendants and for a twenty-one (21) day stay of all proceedings as to the represented Defendants. In support of this Motion, undersigned counsel states as follows:

1. Since undertaking the representation of the represented Defendants a conflict of interest has arisen. The conflict is not between the represented Parties.
2. Pursuant to Alabama Rule of Professional Conduct 1.7, as a result of the conflict, undersigned counsel needs to withdraw from representation of the represented Defendants.
3. Undersigned counsel has notified all represented Defendants of the conflict and the necessity to withdraw.
4. The represented Defendants are actively seeking new representation, and undersigned counsel will fully cooperate with the transition to successor counsel.

5. To aid in the represented Defendants' transition to new counsel, undersigned respectfully requests that the Court enter a twenty-one (21) day stay of all proceedings and deadlines to allow the represented Defendants adequate time to identify, retain, and transition to new counsel.

6. The limited stay will not prejudice the State. Other than the jurisdictional discovery issued to Douglas Friedman, there are currently no pending deadlines, hearings, or other obligations set within the twenty-one (21) day period.

CONCLUSION

WHEREFORE, undersigned counsel respectfully requests that the Court enter an Order:

- (a) Granting Cole R. Gresham and Starnes Davis Florie LLP leave to withdraw as counsel of record for all represented Defendants; and
- (b) Staying all proceedings, deadlines, and obligations of the represented Defendants for a period of twenty-one (21) days from the entry of the Order granting this Motion.

Respectfully submitted this 11th day of September 2026.

s/Cole R. Gresham

Cole R. Gresham

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Attorney for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on September 11, 2026, I filed the foregoing with the Clerk of the Court via the electronic filing system, which will send notification to all counsel of record.

s/ Cole R. Gresham

Cole R. Gresham