

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO.: 21-61176-CIV-SINGHAL

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

PROPERTY INCOME INVESTORS, LLC,
EQUINOX HOLDINGS, INC.,
PROPERTY INCOME INVESTORS 26, LLC,
PROPERTY INCOME INVESTORS 304, LLC,
PROPERTY INCOME INVESTORS 201, LLC,
PROPERTY INCOME INVESTORS 3504, LLC,
PROPERTY INCOME INVESTORS 1361, LLC,
PROPERTY INCOME INVESTORS 4020, LLC,
PROPERTY INCOME INVESTORS 9007, LLC,
PROPERTY INCOME INVESTORS 417, LLC,
PROPERTY INCOME INVESTORS 4450, LLC,
PROPERTY INCOME INVESTORS 3050, LLC,
LARRY B. BRODMAN and ANTHONY
NICOLSI (f/k/a ANTHONY PELUSO),

Defendants.

**RECEIVER’S UNOPPOSED MOTION FOR JORDAN D. MAGLICH
TO WITHDRAW AS COUNSEL**

Miranda L. Soto, Esq., solely in her capacity as Receiver (the “Receiver”) for Defendants Property Income Investors, LLC; Equinox Holdings, Inc.; Property Income Investors 26, LLC; Property Income Investors 304, LLC; Property Income Investors 201, LLC; Property Income Investors 3504, LLC; Property Income Investors 1361, LLC; Property Income Investors 4020, LLC; Property Income Investors 9007, LLC; Property Income Investors 417, LLC; Property Income Investors 4450, LLC; and Property Income Investors 3050, LLC, respectfully requests that this Court enter an Order allowing Attorney Jordan D. Maglich to withdraw as legal counsel for the Receiver. The Receiver also hereby notifies the Court that her current counsel, Raquel A.

Rodriguez, will continue to serve as lead counsel as of the date of this filing. The Receiver states the following in support:

1. Mr. Maglich's last day with Buchanan Ingersoll is April 1, 2022. Mr. Maglich's co-counsel, Raquel A. Rodriguez will continue to serve as the Receiver's lead counsel in this matter.

2. Accordingly, it is requested that Jordan D. Maglich be allowed to withdraw from representation of Receiver Miranda L. Soto, and be relieved of any further responsibility in this matter.

3. It is also requested that Mr. Maglich be removed from the Southern District of Florida Counsel of Record and associated Service List in this matter.

4. It is further requested that all pleadings, motions, notices, and other correspondence continue to be sent to Raquel A. Rodriguez and the law firm of Buchanan Ingersoll & Rooney PC, as the Receiver's counsel in this matter.

5. Pursuant to Local Rule 11.1(d)(3), Receiver's undersigned counsel certifies that the Receiver has been consulted and consents to Mr. Maglich's withdrawal, and that Raquel A. Rodriguez will continue as the Receiver's lead counsel. The Receiver further certifies that counsel for the Plaintiff and individual Defendants do not oppose the requested relief.

WHEREFORE, Miranda L. Soto, as Receiver, respectfully requests that this Court enter an Order: (1) allowing Attorney Jordan D. Maglich to withdraw as legal counsel for Receiver Miranda L. Soto; (2) relieving Mr. Maglich from any further responsibility in this action; (3) removing Mr. Maglich from the Southern District of Florida Counsel of Record and associated Service List in this matter; and (4) directing that all pleadings, motions, notices, and other

correspondence continue to be sent to Raquel A. Rodriguez (lead counsel) and the law firm of Buchanan Ingersoll & Rooney PC, as the Receiver's counsel in this matter.

Local Rule 7.1(a)(3) Certification

Pursuant to Local Rule 7.1(a)(3), the undersigned certifies that he has conferred with counsel for Plaintiff and individual Defendants regarding the relief requested herein. Neither Plaintiff nor counsel for Defendants oppose the requested relief.

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC

/s/ Raquel A. Rodriguez

Raquel A. Rodriguez, Esq. (FBN 511439)

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and

BUCHANAN INGERSOLL & ROONEY PC

By: /s/ Jordan D. Maglich

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Attorneys for Receiver,

Miranda L. Soto

CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2022, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a Notice of Electronic Filing to the following counsel of record:

Alice Sum, Esq.
Securities and Exchange Commission
801 Brickell Avenue, Suite 1950
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*Counsel for Plaintiff, Securities and
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*Counsel for Defendant, Anthony
Nicolosi, f/k/a Anthony Peluso*

I further certify that on March 31, 2022, a true and correct copy of the foregoing was sent via electronic mail to the following:

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/s/ Jordan D. Maglich

Attorney

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