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8 Attorneys for Defendant LANTERN CREDIT, LLC

9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 APOLLO ENTERPRISE SOLUTIONS,  
12 INC., a California corporation,

13 Plaintiff,

14 v.

15 LANTERN CREDIT, LLC, F/K/A NEW  
16 ENGLAND FUNDING  
17 TECHNOLOGIES, LLC, a Delaware  
18 limited liability corporation; and DOES  
19 1-10, inclusive,

20 Defendants.

CASE NO. 2:17-cv-02331-AB-JC

[Assigned to Hon. André Birotte, Jr.]

**JOINT STIPULATION TO  
WITHDRAW MOTION TO  
DISQUALIFY COUNSEL (ECF 14),  
AND FOR STAY**

Los Angeles County Superior Court  
Case No. NC061050

COMPLAINT FILED: February 17, 2017

1           **Plaintiff Apollo Enterprise Solutions, Inc. and Defendant Lantern Credit,**  
2 **LLC hereby stipulate as follows:**

3           WHEREAS, on April 17, 2017, Plaintiff filed a Motion to Disqualify Defendant’s  
4 counsel. (“Motion,” ECF No. 14);

5           WHEREAS, without Lantern or its counsel admitting any fault or conceding any  
6 issue raised in the Motion, Greenberg Traurig, LLP, agrees to voluntarily withdraw as  
7 counsel of record for Lantern in this matter, thereby rendering the Motion moot;

8           WHEREAS, a brief stay of this matter and all pending dates and deadlines for at  
9 least 30 days will conserve judicial resources and facilitate Lantern’s efficient transition  
10 to new counsel;

11           THEREFORE, THE PARTIES AGREE AND STIPULATE that Greenberg  
12 Traurig, LLP, will withdraw of counsel of record for Lantern and have no further  
13 involvement in this matter, and that the Motion (ECF No. 14), be withdrawn as moot.

14           THE PARTIES FURTHER AGREE AND STIPULATE, and respectfully request  
15 that the Court allow the matter and all associated dates and deadlines, including the  
16 pending July 3, 2017 scheduling conference, be stayed for approximately 30 days while  
17 Lantern retains and appoints new counsel. Upon transition to new counsel, the Parties  
18 will submit a modified proposed schedule for the scheduling conference and any  
19 necessary briefing or hearing on remaining pending matters before this Court.

20  
21 DATED: May 15, 2017                   GREENBERG TRAUIG, LLP

22  
23   By   /s/ Tyler R. Andrews    
24   Tyler R. Andrews  
25   Attorneys for Defendant  
26   LANTERN CREDIT, LLC.  
27  
28

1 DATED: May 15, 2017

JEFFER MANGELS BUTLER & MITCHELL LLP

2  
3 By /s/ Stanley M. Gibson

Stanley M. Gibson

Rod S. Berman

Jessica P.G. Newman

Attorneys for Plaintiff

6 APOLLO ENTERPRISE SOLUTIONS, INC.

7  
8 Pursuant to Local Civil Rule 5-4.3.4(a)(2)(i), I hereby attest that Stanley M.  
9 Gibson, on whose behalf this filing is jointly submitted, has concurred in this filing  
10 content and has authorized me to file this document.

11  
12 By: /s/ Tyler R. Andrews

1 **CERTIFICATE OF SERVICE**

2 I, Tyler R. Andrews, an attorney, hereby certify that on May 15, 2017, I caused a  
3 complete and accurate copy of the foregoing document to be served via this Court's  
4 ECM/ECF notification system, which will serve electronically to all participants in the  
5 case.

6 */s/ Tyler R. Andrews* \_\_\_\_\_  
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