

DISTRICT COURT OF APPEAL OF FLORIDA, THIRD DISTRICT

Dilia Palma v. Alfredo Rivera Alamilla

No. 3D25-1181 (Fla. 3d DCA Sept. 3, 2025) · No. 3D25-1181 · Decided September 3, 2025

SUMMARY

The Florida Third District Court of Appeal treated Dilia Palma’s petition for writ of certiorari as an interlocutory appeal from an order denying her motion to disqualify Alfredo Rivera Alamilla’s trial counsel. The court affirmed, holding that the trial court did not abuse its discretion because disqualification of counsel is a drastic remedy available only in limited circumstances.

CASE DETAILS

COURT	District Court of Appeal of Florida, Third District
WRITING FOR THE COURT	LOGUE; LINDSEY; BOKOR
JURISDICTION	Florida Third District Court of Appeal
DECIDED	September 3, 2025
DOCKET	3D25-1181
DISPOSITION	affirmed
PROCEDURAL POSTURE	Petition for writ of certiorari treated as interlocutory appeal of nonfinal order denying motion to disqualify counsel.
STANDARD OF REVIEW	Abuse of discretion
PRECEDENTIAL VALUE	published
PARTIES	Dilia Palma v. Alfredo Rivera Alamilla

TOPICS

- sanctions
- appellate jurisdiction
- standard of review
- civil procedure

PRACTICE AREAS

- civil procedure
- appellate procedure

QUESTIONS PRESENTED

1. Whether the trial court abused its discretion in denying the motion to disqualify respondent's trial counsel.

HOLDINGS

1. The trial court did not abuse its discretion in denying the motion to disqualify counsel because disqualification is a drastic remedy to be employed only in limited circumstances.

KEY QUOTATIONS

“The Court's standard of review for orders entered on motions to disqualify counsel is that of an abuse of discretion. We note, however, that disqualification of a party's lawyer in a civil case is a drastic remedy, which must be employed only in limited circumstances.”

FACTUAL BACKGROUND

The opinion does not recite detailed underlying facts. The procedural posture indicates that in the underlying civil case, Palma filed a motion to disqualify Alamilla's trial counsel, which was denied by the trial court on May 21, 2025. Palma then sought certiorari review.

PROCEDURAL HISTORY

The trial court denied Palma's motion to disqualify respondent's trial counsel. Palma petitioned for writ of certiorari. The District Court of Appeal treated the petition as an interlocutory appeal pursuant to Florida Rule of Appellate Procedure 9.040(c).

DISPOSITION

affirmed

CASES CITED

- Cordero v. Cordero, 368 So. 3d 1065 (Fla. 3d DCA 2023)