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6 UNITED STATES DISTRICT COURT
7 EASTERN DISTRICT OF WASHINGTON

8 ELF-MAN, LLC)
9 Plaintiff,)
10 v.)
11 RYAN LAMBERSON,)
12 Defendant.)
13

Case No.: 2:13-CV-00395-TOR
DECLARATION OF COUNSEL
IN SUPPORT OF MOTION TO
WITHDRAW AS PLAINTIFF'S
COUNSEL OF RECORD

14 I, Maureen C. VanderMay, submit the following declaration:

- 15 1. I am counsel of record for Plaintiff in the above-entitled matter.
16 2. I make this declaration in support of my Motion to Withdraw as Plaintiff's
17 Counsel of Record. My statements are true to the best of my own knowledge,
18 except as to those matters which are therein alleged on information and belief, and
19 as to those matters, I believe them to be true.
20 2. Issues have arisen with Plaintiff's representatives that preclude me from both
21 continuing with representation of Plaintiff and complying with the governing rules
22 of professional conduct. Because of their privileged and confidential nature, I am
23 not setting forth herein in greater detail the reasons for the accompanying motion.
24 In the event that the Court requires me to disclose this information, I request that I
25 be permitted to provide this information under seal.

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27 DECLARATION OF COUNSEL IN SUPPORT
OF MOTION TO WITHDRAW AS PLAINTIFF'S
28 COUNSEL OF RECORD - Page 1

1 3. Plaintiff's representatives have been provided with notice of our intent to file
2 the accompanying motion and have reported that they are diligently seeking
3 replacement counsel.

4 4. Upon information and belief, in order to effect an orderly transition should
5 my motion be granted, Plaintiff's non-appearing counsel, Carl D. Crowell, has
6 spoken by telephone with Defendant's counsel with respect to my motion to
7 withdraw and the status of this case.

8 5. In order to allow Plaintiff sufficient time to locate and retain replacement
9 counsel, our motion asks that Plaintiff be afforded at least sixty (60) days to do so.

10 **I hereby declare that the above statement is true to the best of my**
11 **knowledge and belief, and that I understand it is made for use as evidence in**
12 **court and is subject to penalty for perjury.**

13 DATED: June 3, 2014

14 Respectfully submitted,

15 The VanderMay Law Firm

16 s/ Maureen C. VanderMay
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22 Of Attorneys for Plaintiff
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27 DECLARATION OF COUNSEL IN SUPPORT
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