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The Honorable Barbara J. Rothstein

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

D.S.; D.Y. by and through his next friend
JULIE KELLOGG-MORTENSEN; H.A.
by and through his next friend KRISTEN
BISHOPP; and DISABILITY RIGHTS
WASHINGTON, a nonprofit membership
organization for the federally mandated
Protection and Advocacy Systems,

Plaintiffs,

v.

WASHINGTON STATE
DEPARTMENT OF CHILDREN,
YOUTH, AND FAMILIES; and ROSS
HUNTER, in his official capacity as
Secretary of the Washington State
Department of Children, Youth, and
Families,

Defendants.

NO. 2:21-cv-00113-BJR

UNOPPOSED MOTION TO
SUBSTITUTE LOCAL COUNSEL
PURSUANT TO LOCAL RULE
83.1(d)

1 Plaintiffs move to substitute Christopher Carney as the Local Counsel for attorneys
2 Poonam Juneja, Freya Pitts, and Jean Strout of the National Center for Youth Law, and Laura
3 Lin of Munger, Tolles, & Olson LLP, who have been admitted to appear and participate in this
4 case *pro hac vice* pursuant to Local Rule 83.1(d). Susan Kas of Disability Rights Washington,
5 who previously served as their Local Counsel, has withdrawn from this case simultaneously
6 with this motion. Christopher Carney's Statement of Local Counsel is attached in support of
7 this motion.

8 Defendants have represented that they do not oppose this motion.
9

10 Dated: October 14, 2022

11 Respectfully submitted,

12 **DISABILITY RIGHTS WASHINGTON**

13 /s/ Carina Tong

14 Carina Tong, WSBA #53304

15 315 5th Ave South, Suite 850

16 Seattle, WA 98104

17 Tel. (206) 324-1521

18 Fax (206) 957-0729

19 Email: carinat@dr-wa.org

20 **CARNEY GILLESPIE PLLP**

21 /s/ Christopher Carney

22 Christopher Carney, WSBA #30325

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24 Seattle, WA 98104

25 Tel. (206) 445-0212

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Email: christopher.carney@carneygillespie.com

NATIONAL CENTER FOR YOUTH LAW

/s/ Poonam Juneja

Poonam Juneja, *admitted pro hac vice*

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Freya Pitts, *admitted pro hac vice*
Jean Strout, *admitted pro hac vice*
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CHILDREN’S RIGHTS

/s/ Leecia Welch
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Email: lwelch@childrensrights.org

MUNGER, TOLLES & OLSON LLP

/s/ Laura Lin
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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2022, I caused to be electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Marko Pavela marko.pavela@atg.wa.gov

James Richardson james.richardsoniii@atg.wa.gov

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 14th day of October, 2022.

Mona Rennie, Legal Assistant
Disability Rights Washington

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ORDER GRANTING
UNOPPOSED MOTION TO
SUBSTITUTE LOCAL
COUNSEL PURSUANT TO
LOCAL RULE 83.1(d)

1 Having considered Plaintiffs' Unopposed Motion to Substitute Local Counsel Pursuant
2 to Local Rule 83.1(d), and its supporting papers, the Court hereby GRANTS the motion.
3 Christopher Carney is substituted as the Local Counsel for attorneys Poonam Juneja, Freya
4 Pitts, and Jean Strout of the National Center for Youth Law, and Laura Lin of Munger, Tolles,
5 & Olsen LLP, who have been admitted to appear and participate in this case *pro hac vice*
6 pursuant to Local Rule 83.1(d).
7

8 DATED this 3rd day of November, 2022.

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12

BARBARA J. ROTHSTEIN
United States District Judge

13
14 Presented by:

15
16 **DISABILITY RIGHTS WASHINGTON**

17 /s/ Carina Tong

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21 **CARNEY GILLESPIE PLLP**

22 /s/ Christopher Carney

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NATIONAL CENTER FOR YOUTH LAW

/s/ Poonam Juneja
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CHILDREN’S RIGHTS

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STATEMENT OF LOCAL
COUNSEL IN SUPPORT OF
UNOPPOSED MOTION TO
SUBSTITUTE LOCAL COUNSEL
PURSUANT TO LOCAL RULE
83.1(d)

1 I am authorized and will be prepared to handle this matter, including trial, in the event
2 the applicants, Poonam Juneja, Freya Pitts, Jean Strout, and Laura Lin, are unable to be present
3 upon any date assigned by this Court.
4

5 Dated: October 14, 2022

6 Respectfully submitted,

7 **CARNEY GILLESPIE PLLP**

8 /s/ Christopher Carney

9 Christopher Carney, WSBA #30325

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