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7		The Honorable Barbara J. Rothstein
8	LINUTED OT A TEO D	
9	UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON	
10	AT SEA	TTLE
11	D.S.; D.Y. by and through his next friend JULIE KELLOGG-MORTENSEN; H.A.	NO. 2:21-cv-00113-BJR
12	by and through his next friend KRISTEN	LINOPROSED MOTION TO
13	BISHOPP; and DISABILITY RIGHTS WASHINGTON, a nonprofit membership	UNOPPOSED MOTION TO SUBSTITUTE LOCAL COUNSEL
14	organization for the federally mandated Protection and Advocacy Systems,	PURSUANT TO LOCAL RULE 83.1(d)
15	Plaintiffs,	
16		
17	V.	
18	WASHINGTON STATE DEPARTMENT OF CHILDREN,	
19	YOUTH, AND FAMILIES; and ROSS HUNTER, in his official capacity as	
20	Secretary of the Washington State	
21	Department of Children, Youth, and Families,	
22	Defendants.	
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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 Susan Kas of Disability Rights Washington, 5 who previously served as their Local Counsel, has withdrawn from this case simultaneously 6 with this motion.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 Respectfully submitted, 12 DISABILITY RIGHTS WASHINGTON 13 /s/ Carina Tong 14 Carina Tong, WSBA #53304 315 5th Ave South, Suite 850 15 Seattle, WA 98104 Tel. (206) 324-1521 16 Fax (206) 957-0729 17 Email: carinat@dr-wa.org 18 **CARNEY GILLESPIE PLLP** 19 /s/ Christopher Carney Christopher Carney, WSBA #30325 20 600 1st Ave, Suite LL08 Seattle, WA 98104 Tel. (206) 445-0212 22 Fax (206) 238-9987 Email: christopher.carney@carneygillespie.com 23 NATIONAL CENTER FOR YOUTH LAW 24 25 <u>/s/ Poonam Juneja</u> Poonam Juneja, admitted pro hac vice 26

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2	Jean Strout, admitted pro hac vice
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	Email: pjuneja@youthlaw.org
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6	CHILDREN'S RIGHTS
7	/s/ Leecia Welch
´	Leecia Welch, WSBA #26590
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	San Francisco, CA 94115
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10	Email: <u>lwelch@childrensrights.org</u>
11	MUNGER, TOLLES & OLSON LLP
12	/s/ Laura Lin
13	Laura Lin, admitted pro hac vice
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14	San Francisco, CA 94105
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17	Alex Gorin, WSBA No. 53538
17	350 S. Grand Ave., 50th Floor
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	Tel. (213) 683-9226
19	Fax (213) 683-4024
20	Email: <u>Alex.Gorin@mto.com</u>
	ATTORNEYS FOR PLAINTIFFS
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1	CERTIFICATE OF SERVICE			
2	I hereby certify that on October 14, 2022, I caused to be electronically filed the			
3	foregoing with the Clerk of the Court using the CM/ECF system which will send notification			
4	of such filing to the following:			
5	Marko Pavela <u>marko.pavela@atg.wa.gov</u>			
6	James Richardson james.richardsoniii@atg.wa.gov			
7	I certify under penalty of perjury under the laws of the state of Washington that the			
8	foregoing is true and correct. DATED this 14th day of October, 2022.			
9 10				
11				
12	Mona Rennie, Legal Assistant			
13	Disability Rights Washington			
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Disability Rights Washington 315 5th Avenue South, Suite 850 Seattle, Washington 98104 Phone: (206) 324-1521 Fax: (206) 957-0729

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9	UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON	
10	AT SEA	TTLE
11	D.S.; D.Y. by and through his next friend JULIE KELLOGG-MORTENSEN; H.A.	NO. 2:21-cv-00113-BJR
12	by and through his next friend KRISTEN	ODDED OD ANTONO
13	BISHOPP; and DISABILITY RIGHTS WASHINGTON, a nonprofit membership	ORDER GRANTING UNOPPOSED MOTION TO
14	organization for the federally mandated Protection and Advocacy Systems,	SUBSTITUTE LOCAL COUNSEL PURSUANT TO
15	• •	LOCAL RULE 83.1(d)
16	Plaintiffs,	
17	V.	
18	WASHINGTON STATE DEPARTMENT OF CHILDREN,	
19	YOUTH, AND FAMILIES; and ROSS	
20	HUNTER, in his official capacity as Secretary of the Washington State	
21	Department of Children, Youth, and Families,	
22	Defendants.	
23	Detendants.	
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Having considered Plaintiffs' Unopposed Motion to Substitute Local Counsel Pursuant to Local Rule 83.1(d), and its supporting papers, the Court hereby GRANTS the motion. Christopher Carney is substituted as the Local Counsel for attorneys Poonam Juneja, Freya Pitts, and Jean Strout of the National Center for Youth Law, and Laura Lin of Munger, Tolles, & Olsen LLP, who have been admitted to appear and participate in this case pro hac vice pursuant to Local Rule 83.1(d). DATED this 3rd day of November, 2022. Barbara & Rothetein BARBARA J. ROTHSTEIN United States District Judge Presented by: DISABILITY RIGHTS WASHINGTON /s/ Carina Tong Carina Tong, WSBA #53304 315 5th Ave South, Suite 850 Seattle, WA 98104 Tel. (206) 324-1521 Fax (206) 957-0729 Email: carinat@dr-wa.org **CARNEY GILLESPIE PLLP** <u>/s/ Christopher Carney</u> Christopher Carney, WSBA #30325 600 1st Ave, Suite LL08 Seattle, WA 98104 Tel. (206) 445-0212 Fax (206) 238-9987 Email: christopher.carney@carneygillespie.com

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2	NATIONAL CENTER FOR YOUTH LAW
3	/s/ Poonam Juneja
4	Poonam Juneja, admitted pro hac vice Freya Pitts, admitted pro hac vice
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9	CHILDREN'S RIGHTS
10	/s/ Leecia Welch
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9	UNITED STATES D WESTERN DISTRICT	
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12	JULIE KELLOGG-MORTENSEN; H.A. by and through his next friend KRISTEN	
13	BISHOPP; and DISABILITY RIGHTS WASHINGTON, a nonprofit membership	STATEMENT OF LOCAL COUNSEL IN SUPPORT OF
14	organization for the federally mandated	UNOPPOSED MOTION TO
15	Protection and Advocacy Systems,	SUBSTITUTE LOCAL COUNSEL PURSUANT TO LOCAL RULE
16	Plaintiffs,	83.1(d)
17	v.	
18	WASHINGTON STATE	
	DEPARTMENT OF CHILDREN, YOUTH, AND FAMILIES; and ROSS	
19	HUNTER, in his official capacity as	
20	Secretary of the Washington State Department of Children, Youth, and	
21	Families,	
22	Defendants.	
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STATEMENT OF LOCAL COUNSEL IN SUPPORT OF UNOPPOSED MOTION TO SUBSTITUTE LOCAL COUNSEL PURSUANT TO LOCAL RULE 83.1(d) NO. 2:21-CV-00113

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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 <u>/s/ Christopher Carney</u> 9 Christopher Carney, WSBA #30325 600 1st Ave, Suite LL08 10 Seattle, WA 98104 Tel. (206) 445-0212 11 Fax (206) 238-9987 12 Email: christopher.carney@carneygillespie.com 13 14 15 16 17 18 19 20 21 22 23 24 25 26

STATEMENT OF LOCAL COUNSEL IN SUPPORT OF UNOPPOSED MOTION TO SUBSTITUTE LOCAL COUNSEL PURSUANT TO LOCAL RULE 83.1(d) NO. 2:21-CV-00113