

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WASHINGTON  
AT SEATTLE

JEREMY CONKLIN, D.O., an individual,

Plaintiff,

vs.

UNIVERSITY OF WASHINGTON  
MEDICINE, a Washington public health  
system; UW MEDICINE/NW, a Washington  
public benefit corporation; UNIVERSITY OF  
WASHINGTON MEDICAL CENTER, a  
Washington public hospital; UNIVERSITY  
OF WASHINGTON SCHOOL OF  
MEDICINE, a Washington public educational  
institution; PAUL RAMSEY, M.D., in his  
official capacity and individually; LESTER  
PERMUT, M.D., in his official capacity and  
individually; SEATTLE CHILDREN'S  
HOSPITAL, a Washington non-profit  
corporation; CHILDREN'S UNIVERSITY  
MEDICAL GROUP, a Washington pediatric  
group; MARY BRIDGE CHILDREN'S  
FOUNDATION, a Washington public benefit  
corporation; AMERICAN BOARD OF  
THORACIC SURGERY, INC., an Illinois  
non-profit corporation; THORACIC  
SURGERY DIRECTORS ASSOCIATION,  
INC., a North Carolina non-profit  
corporation; and ACCREDITATION  
COUNCIL FOR GRADUATE MEDICAL

NO. 2:18-cv-00090-RSL

STIPULATION AND ~~PROPOSED~~  
ORDER OF WITHDRAWAL AND  
SUBSTITUTION OF COUNSEL FOR  
DEFENDANT THORACIC SURGERY  
DIRECTORS ASSOCIATION, INC.

NOTE ON MOTION CALENDAR:  
February 22, 2018

STIPULATION AND ~~PROPOSED~~  
ORDER OF WITHDRAWAL AND  
SUBSTITUTION OF COUNSEL (2:18-cv-  
00090-RSL)

·Betts  
Patterson  
Mines  
One Convention Place  
Suite 1400  
701 Pike Street  
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(206) 292-9988

1 EDUCATION, an Illinois non-profit  
2 corporation,

3 Defendants.

4 Pursuant to LCR 83.2(b)(1), Plaintiff Jeremy Conklin, D.O. and Defendant Thoracic  
5 Surgery Directors Association, Inc. ("TSDA"), through their respective counsel, hereby stipulate  
6 and move the Court for an order allowing the withdrawal and substitution of counsel as outlined  
7 below.

8 **I. STIPULATION**

9 Plaintiff and TSDA stipulate and agree as follows:

10 1. TSDA is currently represented by William F. Cronin and Kristina Markosova of  
11 Corr Cronin Michelson Baumgardner Fogg & Moore LLP. William F. Cronin and Kristina  
12 Markosova request leave to withdraw as counsel for TSDA pursuant to LCR 83.2(b)(1).

13 2. TSDA has retained James D. Nelson, Shaina R. Johnson, and Natalie A. Moore of  
14 Betts, Patterson & Mines, P.S. to represent it in this matter. James D. Nelson, Shaina R.  
15 Johnson, and Natalie A. Moore request that they be substituted as counsel for TSDA pursuant to  
16 LCR 83.2(b)(1).

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DATED this 22<sup>nd</sup> day of February, 2018.

HKM EMPLOYMENT ATTORNEYS, LLP      BETTS, PATTERSON & MINES, P.S.

By/s/Kristi Favard [per email authorization]

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By/s/James D. Nelson

By/s/Shaina R. Johnson

By/s/Natalie A. Moore

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Substituting Attorneys for Defendant  
Thoracic Surgery Directors Association, Inc.

CORR CRONIN MICHELSON  
BAUMGARDNER FOGG & MOORE LLP

By/s/William F. Cronin [per email authorization]

By/s/Kristina Markosova [per email authorization]

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Withdrawing Attorneys for Defendant  
Thoracic Surgery Directors Association, Inc.

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II. ORDER

The Court approves the above stipulation and orders as follows:

1. William F. Cronin and Kristina Markosova of Corr Cronin Michelson

Baumgardner Fogg & Moore LLP are granted leave to withdraw as counsel for Thoracic Surgery Directors Association, Inc.

2. James D. Nelson, Shaina R. Johnson, and Natalie A. Moore of Betts, Patterson &

Mines, P.S. are hereby substituted as counsel for Thoracic Surgery Directors Association, Inc.

DATED this 23<sup>rd</sup> day of Feb., 2018

MS Casvik  
UNITED STATES DISTRICT JUDGE

Lodged by:

BETTS, PATTERSON & MINES, P.S.

By/s/James D. Nelson

By/s/Shaina R. Johnson

By/s/Natalie A. Moore

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Substituting Attorneys for Defendant Thoracic  
Surgery Directors Association, Inc.

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1 Approved for entry by:

2 HKM EMPLOYMENT ATTORNEYS, LLP

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3 By/s/*Kristi Favard* [per email authorization]

Kristi Favard, WSBA #34419

By/s/*William F. Cronin* [per email authorization]

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Withdrawing Attorneys for Defendant

Thoracic Surgery Directors Association, Inc.

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