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HONORABLE RICARDO S. MARTINEZ

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

DERICK D'HAITI,

Plaintiff,

vs.

PHILIPS NORTH AMERICA LLC d/b/a  
PHILIPS HEALTHCARE, a Delaware  
limited-liability company; JONES LANG  
LASALLE AMERICAS, INC., a Maryland  
Corporation; ABM INDUSTRIES  
INCORPORATED, a Delaware corporation;  
ABC Company and XYZ Company,

Defendants.

NO. 2:20-CV-00358-RSM

STIPULATION AND PROPOSED  
ORDER FOR WITHDRAWAL AND  
SUBSTITUTION OF COUNSEL

TO: THE CLERK OF COURT

AND TO: ALL PARTIES AND COUNSEL OF RECORD

STIPULATION

The parties, by and through their respective counsel, hereby stipulate to the withdrawal  
of David D. Mordekhov of Gardner Trabolsi & Mordekhov and Ramona N. Hunter of Wilson

STIPULATION AND PROPOSED ORDER FOR WITHDRAWAL  
AND SUBSTITUTION OF COUNSEL – 1

Case: 2:20-CV-00358-RSM

032491.000013 D'Haiti C20-358 stip order subst cnsl

**REED M<sup>C</sup>CLURE**

ATTORNEYS AT LAW  
FINANCIAL CENTER  
1215 FOURTH AVENUE, SUITE 1700  
SEATTLE, WASHINGTON 98161-1087  
(206) 292-4900; FAX (206) 223-0152

1 Elser Moskowitz Edelman & Dicker, LLP as Attorneys of Record for Defendant(s) Jones LaSalle  
2 Americas, Inc.

3 Further, the parties, by and through their respective counsel, hereby stipulate to the  
4 withdrawal of Anthony R. Scisciani and Kelsey L. Shewbert as Attorneys of Record for Philips  
5 North America d/b/a Philips Healthcare.

6 From this date forward, please send all pleadings, notice, calendars, and other  
7 communication concerning this case for Jones Lang LaSalle Americas, Inc. **and** Philips North  
8 America d/b/a Philips Healthcare to Jason E. Vacha, Reed McClure, 1215 Fourth Avenue, Suite  
9 1700, Seattle, Washington 98164-1087.

11 WHEREAS, Plaintiff Derick D'Haiti represented by Donna L. Mack of Emerald Law  
12 Group, PLLC, stipulates to the withdrawal of David D. Mordekhov of Gardner Trabolsi &  
13 Mordekhov and Ramona N. Hunter of Wilson Elser Moskowitz Edelman & Dicker, LLP as  
14 counsel of record for Jones Lang LaSalle Americas, Inc. **and** stipulates to the withdrawal of  
15 Anthony R. Scisciani and Kelsey L. Shewbert as Attorneys of Record for Philips North America  
16 d/b/a Philips Healthcare.

18 PER LCR 83.2, the undersigned counsel stipulates to the Withdrawal of David D.  
19 Mordekhov and Ramona N. Hunter from this matter and the entry of Jason E. Vacha and the law  
20 firm of REED McCLURE as counsel for Jones Lang LaSalle Americas, Inc. in this matter.

21 PER LCR 83.2, the undersigned counsel also stipulates to the Withdrawal of Anthony R.  
22 Scisciani and Kelsey L. Shewbert from this matter and the entry of Jason E. Vacha and the law  
23 firm of REED McCLURE as counsel for Philips North America d/b/a Philips Healthcare in this  
24 matter.  
25

1  
2 IT IS SO STIPULATED this 24<sup>th</sup> day of May, 2021.  
3

4 REED McCLURE  
5

6 /s/ Jason E. Vacha

7 Jason E. Vacha, WSBA #34069

8 *Substituting* Attorney for Defendant Jones Lang LaSalle  
9 Americas, Inc. and Philips North America d/b/a  
Philips Healthcare

10 GARDNER TRABOLSI & MORDEKHOV PLLC  
11

12 /s/ David D. Mordekhov

13 David D. Mordekhov, WSBA #32900

14 *Withdrawing* Attorney for Defendant Jones Lang LaSalle America, Inc.

15 WILSON ELSER MOSKOWITZ  
16 EDELMAN & DICKER, LLP

17 /s/ Ramona N. Hunter

18 Ramona N. Hunter, WSBA #31482

19 *Withdrawing* Attorney for Defendant Jones Lang LaSalle America, Inc.

20 HOLT WOODS & SCISCIANI, LLP  
21

22 /s/ Kelsey L. Shewbert

23 Anthony R. Scisciani III, WSBA #32342

24 Kelsey L. Shewbert, WSBA #51214

25 *Withdrawing* Attorneys for Philips North America LLC d/b/a Philips Healthcare

STIPULATION AND PROPOSED ORDER FOR WITHDRAWAL  
AND SUBSTITUTION OF COUNSEL – 3  
Case: 2:20-CV-00358-RSM

032491.000013 D'Haiti C20-358 stip order subst cnsl

**REED McCLURE**  
ATTORNEYS AT LAW  
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1215 FOURTH AVENUE, SUITE 1700  
SEATTLE, WASHINGTON 98161-1087  
(206) 292-4900; FAX (206) 223-0152

1 EMERALD LAW GROUP, PLLC

2 /s/ Donna L. Mack

3 Donna L. Mack, WSBA #30875

4 Attorney for Plaintiff

5 ORDER

6 Based upon the above Stipulation, it is hereby ORDERED, ADJUDGED, and DECREED  
7 that David D. Mordekhov of Gardner Trabolsi & Mordekhov and Ramona N. Hunter of Wilson  
8 Elser Moskowitz Edelman & Dicker, LLP are hereby withdrawn as counsel for Defendant Jones  
9 Lang LaSalle Americas, Inc. in this matter and that Anthony R. Scisciani and Kelsey L. Shewbert  
10 are hereby withdrawn as counsel for Philips North America d/b/a Philips Healthcare,  
11

12 AND, that Jason E. Vacha substitutes as the attorney of record for Defendants Jones Lang  
13 LaSalle Americas, Inc, and Philips North America d/b/a Philips Healthcare.  
14

15 DATED this 26<sup>th</sup> day May, 2021.

16 

17 RICARDO S. MARTINEZ  
18 CHIEF UNITED STATES DISTRICT JUDGE  
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25

1 Presented by:

2 REED McCLURE

3  
4 /s/ Jason E. Vacha

5 Jason E. Vacha, WSBA #34069

6 *Substituting* Attorney for Defendant Jones Lang LaSalle Americas, Inc.  
and Philips North America d/b/a Philips Healthcare

7 GARDNER TRABOLSI & MORDEKHOV PLLC

8  
9 /s/ David D. Mordekhov

10 David D. Mordekhov, WSBA #32900

*Withdrawing* Attorney for Defendant Jones Lang LaSalle America, Inc.

11 WILSON ELSER MOSKOWITZ

12 EDELMAN & DICKER, LLP

13  
14 /s/ Ramona N. Hunter

15 Ramona N. Hunter, WSBA #31482

*Withdrawing* Attorney for Defendant Jones Lang LaSalle America, Inc.

16  
17 HOLT WOODS & SCISCIANI, LLP

18  
19 /s/ Kelsey L. Shewbert

Anthony R. Scisciani III, WSBA #32342

Kelsey L. Shewbert, WSBA #51214

20 *Withdrawing* Attorneys for Philips North America LLC d/b/a Philips Healthcare

21  
22 EMERALD LAW GROUP, PLLC

23  
24 /s/ Donna L. Mack

Donna L. Mack, WSBA #30875

25 Attorney for Plaintiff

STIPULATION AND PROPOSED ORDER FOR WITHDRAWAL  
AND SUBSTITUTION OF COUNSEL – 5

Case: 2:20-CV-00358-RSM

032491.000013 D'Haiti C20-358 stip order subst cnsl

REED McCLURE

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STIPULATION AND PROPOSED ORDER FOR WITHDRAWAL  
AND SUBSTITUTION OF COUNSEL – 6  
Case: 2:20-CV-00358-RSM

032491.000013 D'Haiti C20-358 stip order subst cnsl

**REED M<sup>C</sup>CLURE**  
ATTORNEYS AT LAW  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 25, 2021, I 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:

Donna L. Mack  
Emerald law Group, PLLC  
811 First Avenue, #510  
Seattle, WA 98104  
(206) 826-5160  
[donna@emeraldawgroup.com](mailto:donna@emeraldawgroup.com)

Anthony R. Scisciani, III  
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(206) 256-6309  
[dmordekhov@gandtlawfirm.com](mailto:dmordekhov@gandtlawfirm.com)

and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

*N/A*

DATED: May 25, 2021.

/s/ Carolyn Lafferty

Carolyn Lafferty