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8 UNITED STATES DISTRICT COURT  
9 WESTERN DISTRICT OF WASHINGTON  
10 AT SEATTLE

11 WATM LLC d/b/a STEVENS &  
12 ASSOCIATES/STEVENS  
13 MANAGEMENT SERVICES,

14 Plaintiff,

15 v.

16 PAYMENT ALLIANCE  
17 INTERNATIONAL, INC.,

18 Defendant.

Case No.: 2:24-cv-00405-JHC

STIPULATION & ORDER RE:  
WITHDRAWAL AND SUBSTITUTION OF  
COUNSEL FOR PAYMENT ALLIANCE  
INTERNATIONAL, INC.

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STIPULATION AND ORDER RE :WITHDRAWAL AND  
SUBSTITUTION OF COUNSEL FOR  
PAYMENT ALLIANCE INTERNATIONAL, INC.  
Case No. 2:24-cv-00405-JHC

1 Pursuant to Local Rules 83.2(b)(1) and 7(d)(1), Defendant and Counterclaimant  
2 Payment Alliance International, Inc. ("PAI") respectfully files this stipulation to withdraw and  
3 substitute counsel as follows:

4 WHEREAS, PAI previously retained the law firms of DLA Piper LLP (US) ("DLA  
5 Piper") and McFadden Trachtenberg PLLC ("GreatLaw") as its counsel in this matter.

6 WHEREAS, PAI no longer desires to be represented by those firms, and instead seeks  
7 to be represented in this matter by the law firm Duane Morris, LLP.

8 WHEREAS, Duane Morris, LLP contacted counsel for WATM via phone on December  
9 27, 2024, to inform WATM of the pending change in counsel, which was going to be effective  
10 January 1, 2025, and all communication between counsel for WATM and counsel for PAI since  
11 December 27, 2024, including discovery communication, has been with Ryan Borneman of  
12 Duane Morris LLP, who intends to seek *pro hac vice* admission to this case on behalf of PAI.

13 WHEREAS, PAI and its substituting counsel at Duane Morris LLP are aware of the  
14 current case scheduling order (Dkt. #14) entered on May 14, 2024, and stipulate that the change  
15 of counsel will not be relied on as justification for any changes to the case schedule nor as  
16 justification for any discovery delays.

17 Accordingly, PAI brings this stipulated motion requesting an order approving the  
18 substitution of Duane Morris LLP in the place of DLA Piper and GreatLaw as PAI's counsel in  
19 this action. Specifically, PAI requests that Austin M. Rainwater and Jeffrey B DeGroot of  
20 DLA Piper, and Brian A. Srubar and Brian Trachtenberg of GreatLaw withdraw as counsel in  
21 this action, and that the following attorneys may substitute in as counsel for PAI:

22 William J. Baron, WSB No. 61409  
23 Lauren M. Case, WSB No. 49558  
24 DUANE MORRIS LLP  
25 Spear Tower  
26 One Market Plaza, Suite 2200  
San Francisco, CA 94105  
Telephone: +1 415 957 3000  
Fax: +1 415 957 3001  
E-mail: wjbaron@duanemorris.com  
lmcase@duanemorris.com

1 IT IS HEREBY STIPULATED AND AGREED, by the Parties, and subject to the  
2 Court's approval, that Duane Morris, LLP may substitute in as counsel for PAI, and DLA Piper  
3 and GreatLaw may withdraw.

4 DATED: January 15, 2025

**DLA PIPER LLP (US)**

6 By: /s/ Austin Rainwater

Austin Rainwater, WSB No. 41904  
austin.rainwater@us.dlapiper.com  
Jeffrey DeGroot, WSB No. 46839  
jeffrey.degroot@us.dlapiper.com  
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Telephone: +1 206 839 4800

Attorneys for Defendant and Counter Claimant  
PAYMENT ALLIANCE INTERNATIONAL INC.

12 DATED: January 15, 2025

**MCFADDEN TRACHTENBERG PLLC**

14 By: /s/ Brian Srubar

Brian Trachtenberg, Texas Bar No. 24037608  
brian@GreatLaw.com  
Brian A. Srubar, Texas Bar No. 24098460  
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4200 Montrose Blvd, Ste. 300  
Houston, TX 77006  
Telephone: +1 713 688 6789

Attorneys for Defendant and Counter Claimant  
PAYMENT ALLIANCE INTERNATIONAL INC.

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1 DATED: January 15, 2025

**DUANE MORRIS LLP**

2  
3 By: /s/ Lauren M. Case

4 William J. Baron, WSB No. 61409  
wjbaron@duanemorris.com  
5 Lauren M. Case, WSB No. 49558  
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7 San Francisco, CA 94105  
Telephone: +1 415 957 3000

8 Attorneys for Defendant and Counter Claimant  
9 PAYMENT ALLIANCE INTERNATIONAL INC.

10 DATED: January 15, 2025

**STOKES LAWRENCE, P.S.**

11  
12 By: /s/ Brett MacIntyre

13 Matthew Harrington, WSB No. 33276  
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14 Brett MacIntyre, WSB No. 46572  
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15 1420 Fifth Avenue, Suite 3000  
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17 Attorneys for Plaintiff and Counter-Defendant  
18 WATM LLC d/b/a STEVENS &  
19 ASSOCIATES/STEVENS MANAGEMENT  
20 SERVICES  
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**ORDER**

The Stipulated Motion re Withdrawal and Substitution of Counsel for Payment Alliance International, Inc. is GRANTED.

The law firm of Duane Morris, LLP is substituted in as counsel for Defendant and Counter Claimant Payment Alliance International, Inc., and the law firms of DLA Piper LLP (US) and McFadden Trachtenberg PLLC are withdrawn as counsel.

**IT IS SO ORDERED.**

DATED this 15th day of January, 2025.



JOHN H. CHUN  
UNITED STATES DISTRICT JUDGE