

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

DAMONIE EARL, LINDA RUGG, ALESA BECK, TIMOTHY BLAKEY, JR., STEPHANIE BLAKEY, MARISA THOMPSON, MUHAMMAD MUDDASIR KHAN, ELIZABETH COOPER, JOHN ROGERS, VALERIE MORTZ-ROGERS, and LAKESHA GOGGINS, each individually and on behalf of all others similarly situated,

Plaintiffs.

v.

THE BOEING COMPANY,
SOUTHWEST AIRLINES CO.,

Defendants.

Civil Action No. 4:19-cv-00507-ALM

**PLAINTIFFS' MOTION TO WITHDRAW PIERCE BAINBRIDGE AS CO-COUNSEL
AND REQUEST FOR TERMINATION OF ELECTRONIC NOTICE**

Plaintiffs, respectfully request that the law firm Pierce Bainbridge Beck Price & Hecht LLP (“Pierce Bainbridge”), and following attorneys (“Withdrawing Attorneys”), be permitted to withdraw as counsel of record for Plaintiffs in the above-referenced case:

1. Andrew Michael Williamson.
2. Andrew Jay Lorin.
3. Andrew Wolinsky.
4. David Hecht.
5. Barron McGinnis Flood.
6. Michael Pomeranz.

As of April 15, 2020, none of the Withdrawing Attorneys will remain associated with Pierce Bainbridge. Lead counsel for Plaintiffs, Yavar Bathaee and Brian Dunne of Bathaee Dunne LLP, and their local counsel, Elizabeth L. DeRieux of Capshaw DeRieux LLP, will continue to appear as counsel on behalf of Plaintiffs in this action. Therefore this withdrawal will not be cause for any

delay and will not prejudice Plaintiffs or Defendants. Accordingly, and pursuant to Local Rule CV-11(c)-(d), Plaintiffs request that Pierce Bainbridge, and its Withdrawing Attorneys be permitted to withdraw as attorney of record, and that Clerk of the Court terminate the Withdrawing Attorneys' receipt of electronic notices for this matter.

Dated: April 14, 2020

Respectfully submitted,

/s/ Andrew M. Williamson

Andrew M. Williamson (D.C. 1011095)

PIERCE BAINBRIDGE BECK

PRICE & HECHT LLP

601 Pennsylvania Avenue, NW

South Tower, Suite 700

Washington, DC 20004

202-318-9001 – Telephone

202-463-2103 – Facsimile

awilliamson@piercebainbridge.com

Andrew J. Lorin (NY 2368249)

alorin@piercebainbridge.com

Andrew Wolinsky (NY 4892196)

awolinsky@piercebainbridge.com

David Hecht (NY 4695961)

dhecht@piercebainbridge.com

Michael Pomerantz (NY 2920932)

Michael.m.pomerantz@gmail.com

Barron McGinnis Flood (NY 5585765)

bflood@piercebainbridge.com

PIERCE BAINBRIDGE BECK

PRICE & HECHT LLP

277 Park Avenue, 45th Floor

New York, New York 10172

Tel: (212) 484-9866

Yavar Bathaee (NY 4703443) (Lead Counsel)

yavar@bathaeedunne.com

Brian J. Dunne (CA 275689)

bdunne@bathaeedunne.com

BATHAEE DUNNE LLP

430 Park Avenue

New York, NY 10022

Tel: (213) 534-7501

Elizabeth L. DeRieux (TX 05770585)
ederieux@capshawlaw.com
CAPSHAW DERIEUX, LLP
114 E. Commerce Ave.
Gladewater, TX 75647
Tel: (903) 845-5770

Attorneys for Plaintiffs

CERTIFICATE OF CONFERENCE

As required by Local CV-7(h), undersigned counsel for Plaintiffs exchanged more than a half dozen emails with respective counsel for Defendants (between April 13, 2020 and April 14, 2020) in an effort to meet and confer and obtain Defendants' consent to this motion. However, counsel for Defendants were not available for a phone call on April 14th and thus, under the circumstances, the parties were not able to confer on the telephone with sufficient time to enable Plaintiffs to timely request withdrawal prior to April 15th. As of the time of this filing, undersigned counsel was unable to obtain the Defendants' concurrence in the relief sought in this motion. Lead counsel for Plaintiffs consent to the relief sought in this motion.

/s/ Andrew M. Williamson
Andrew M. Williamson

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service were served with a copy of this document through this Court's CM/ECF system and pursuant to the local rules on April 14, 2020.

/s/ Andrew M. Williamson
Andrew M. Williamson

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

DAMONIE EARL, LINDA RUGG, ALESA BECK, TIMOTHY BLAKEY, JR., STEPHANIE BLAKEY, MARISA THOMPSON, MUHAMMAD MUDDASIR KHAN, ELIZABETH COOPER, JOHN ROGERS, VALERIE MORTZ-ROGERS, and LAKESHA GOGGINS, each individually and on behalf of all others similarly situated,

Plaintiffs.

v.

THE BOEING COMPANY,
SOUTHWEST AIRLINES CO.,

Defendants.

Civil Action No. 4:19-cv-00507-ALM

**PLAINTIFFS' MOTION TO WITHDRAW PIERCE BAINBRIDGE AS CO-COUNSEL
AND REQUEST FOR TERMINATION OF ELECTRONIC NOTICE**

Plaintiffs, respectfully request that the law firm Pierce Bainbridge Beck Price & Hecht LLP (“Pierce Bainbridge”), and following attorneys (“Withdrawing Attorneys”), be permitted to withdraw as counsel of record for Plaintiffs in the above-referenced case:

1. Andrew Michael Williamson.
2. Andrew Jay Lorin.
3. Andrew Wolinsky.
4. David Hecht.
5. Barron McGinnis Flood.
6. Michael Pomeranz.

As of April 15, 2020, none of the Withdrawing Attorneys will remain associated with Pierce Bainbridge. Lead counsel for Plaintiffs, Yavar Bathaee and Brian Dunne of Bathaee Dunne LLP, and their local counsel, Elizabeth L. DeRieux of Capshaw DeRieux LLP, will continue to appear as counsel on behalf of Plaintiffs in this action. Therefore this withdrawal will not be cause for any

delay and will not prejudice Plaintiffs or Defendants. Accordingly, and pursuant to Local Rule CV-11(c)-(d), Plaintiffs request that Pierce Bainbridge, and its Withdrawing Attorneys be permitted to withdraw as attorney of record, and that Clerk of the Court terminate the Withdrawing Attorneys' receipt of electronic notices for this matter.

Dated: April 14, 2020

Respectfully submitted,

/s/ Andrew M. Williamson
Andrew M. Williamson (D.C. 1011095)
**PIERCE BAINBRIDGE BECK
PRICE & HECHT LLP**
601 Pennsylvania Avenue, NW
South Tower, Suite 700
Washington, DC 20004
202-318-9001 – Telephone
202-463-2103 – Facsimile
awilliamson@piercebainbridge.com

Andrew J. Lorin (NY 2368249)
alorin@piercebainbridge.com
Andrew Wolinsky (NY 4892196)
awolinsky@piercebainbridge.com
David Hecht (NY 4695961)
dhecht@piercebainbridge.com
Michael Pomerantz (NY 2920932)
Michael.m.pomerantz@gmail.com
Barron McGinnis Flood (NY 5585765)
bflood@piercebainbridge.com
**PIERCE BAINBRIDGE BECK
PRICE & HECHT LLP**
277 Park Avenue, 45th Floor
New York, New York 10172
Tel: (212) 484-9866

Yavar Bathaee (NY 4703443) (Lead Counsel)
yavar@bathaeedunne.com
Brian J. Dunne (CA 275689)
bdunne@bathaeedunne.com
BATHAEE DUNNE LLP
430 Park Avenue
New York, NY 10022
Tel: (213) 534-7501

Elizabeth L. DeRieux (TX 05770585)
ederieux@capshawlaw.com
CAPSHAW DERIEUX, LLP
114 E. Commerce Ave.
Gladewater, TX 75647
Tel: (903) 845-5770

Attorneys for Plaintiffs

CERTIFICATE OF CONFERENCE

As required by Local CV-7(h), undersigned counsel for Plaintiffs exchanged more than a half dozen emails with respective counsel for Defendants (between April 13, 2020 and April 14, 2020) in an effort to meet and confer and obtain Defendants' consent to this motion. However, counsel for Defendants were not available for a phone call on April 14th and thus, under the circumstances, the parties were not able to confer on the telephone with sufficient time to enable Plaintiffs to timely request withdrawal prior to April 15th. As of the time of this filing, undersigned counsel was unable to obtain the Defendants' concurrence in the relief sought in this motion. Lead counsel for Plaintiffs consent to the relief sought in this motion.

/s/ Andrew M. Williamson
Andrew M. Williamson

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service were served with a copy of this document through this Court's CM/ECF system and pursuant to the local rules on April 14, 2020.

/s/ Andrew M. Williamson
Andrew M. Williamson

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

DAMONIE EARL, LINDA RUGG, ALESA BECK, TIMOTHY BLAKEY, JR., STEPHANIE BLAKEY, MARISA THOMPSON, MUHAMMAD MUDDASIR KHAN, ELIZABETH COOPER, JOHN ROGERS, VALERIE MORTZ-ROGERS, and LAKESHA GOGGINS, each individually and on behalf of all others similarly situated,

Plaintiffs.

v.

THE BOEING COMPANY,
SOUTHWEST AIRLINES CO.,

Defendants.

Civil Action No. 4:19-cv-00507-ALM

ORDER

Before the Court is Plaintiffs' Motion to Withdraw Pierce Bainbridge as Co-Counsel and Request for Termination of Electronic Notices. Having considered the Motion, and any opposition thereto, the Court finds that it should be and is hereby GRANTED.

IT IS THEREFORE ORDERED that the law firm Pierce Bainbridge Beck Price & Hecht, as well as the following attorneys: (1) Andrew Michael Williamson, (2) Andrew Jay Lorin, (3) Andrew Wolinsky, (4) David Hecht, (5) Barron McGinnis Flood, and (6) Michael Pomeranz, are hereby withdrawn as counsel of record for Plaintiffs in this matter. The Clerk of the Court is DIRECTED to terminate any further ECF notices to Andrew Michael Williamson, Andrew Jay Lorin, Andrew Wolinsky, David Hecht, Barron McGinnis Flood, and Michael Pomeranz.