

The Honorable Ricardo S. Martinez

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

LYUDMILA LADUNSKIY and PETER  
LADUNSKIY,

Plaintiffs,

v.

ANDERSON & ASSOCIATES CREDIT  
SERVICES, LLC,

Defendant.

Case No.: 2:24-cv-00114-RSM

**Declaration of Robert E. Sabido in  
Support of Motion for Leave to  
Withdraw As Counsel**

I, Robert E. Sabido, hereby declare:

1. I am an attorney licensed to practice law in the State of Washington, and I am admitted to practice before this Court. I am the attorney of record for Defendant Anderson & Associates Credit Services, LLC (“Defendant”) in the above-captioned matter.

2. I make this declaration in support of my Motion for Leave to Withdraw as Counsel (“the Motion”), based upon personal knowledge, and I am competent to testify to the matters stated herein.

3. The Motion is made pursuant to Washington Rules of Professional Conduct (“RPC”) 1.16 (withdrawal). Pursuant to RPC 1.6(a) (confidentiality of information) and RPC

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**Declaration of Robert E. Sabido in Support of Motion for  
Leave to Withdraw as Counsel – Page 1**

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9385 SW Locust Street  
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Telephone (971) 302-6236  
Facsimile: (503) 974-1673

1 1.6(b)(6) (disclosure upon court order), I am prohibited from sharing further information with the  
2 Court absent Court order.

3 4. Pursuant to LCR 83.2(b)(1), I served a copy of the Motion on Defendant and  
4 Plaintiffs' counsel. Defendant objects to the withdrawal, Plaintiffs' counsel does not object  
5 provided Defendant does not remain unrepresented.

6 5. Counsel is unaware of whether Defendant has elected to retain new counsel.  
7 Defendant's last known address and telephone number are:

8 Anderson & Associates Credit Services, LLC  
9 P.O. Box 230286  
10 Portland, OR 97281  
(503) 293-5400

11 6. The outstanding deadlines in this matter are as follows:

- 12 • May 31, 2024 – response to Plaintiffs' First Requests for Admission to  
13 Defendant; Plaintiffs' First Set of Interrogatories to Defendant; and Plaintiffs'  
14 First Requests for Production to Defendant. Plaintiffs have agreed to an  
15 extension of this deadline to 14 days after the Court decides the Motion;
- 16 • November 20, 2024 – Expert Witness Disclosure/Reports under FRCP  
17 26(a)(2);
- 18 • December 20, 2024 – Motions;
- 19 • January 21, 2025 – Discovery;
- 20 • February 18, 2025 – Dispositive Motions;
- 21 • April 4, 2025 – Mediation;
- 22 • April 21, 2025 – Motions in Limine;
- 23 • May 7, 2025 – Pretrial Order;
- 24 • May 14, 2025 – Trial Briefs; Proposed Findings of Fact and Conclusions of  
25 Law;
- 26 • May 15, 2025 – Bench Trial.

1 7. Given the dates above, the Motion is being filed more than 60 days before the  
2 discovery cutoff date as required by LCR 83.2(b)(1).

3 8. Pursuant to LCR 83.2(b)(4), I have advised Defendant (a business entity) that is  
4 required by law to be represented by an attorney admitted to practice before this Court and that  
5 failure to obtain a replacement attorney by the date the withdrawal is effective may result in  
6 entry of default against the business entity as to any of Plaintiffs' claims.

7 I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE  
8 AND CORRECT.

9 DATED: May 30, 2024

10 SABIDO LAW, LLC

11 */s/ Robert E. Sabido*

12 Robert E. Sabido, WSBA No. 29170

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14 9385 SW Locust Street

15 Tigard, OR 97223

16 Telephone: (971) 302-6236

17 Fax: (503) 974-1673

18 Attorney for Defendant

**CERTIFICATE OF SERVICE**

I hereby certify that on May 30, 2024, I served the foregoing **Declaration of Robert E. Sabido in Support of Motion for Leave to Withdraw as Counsel** by electronic filing notification on the following:

Jason D. Anderson  
T. Tyler Santiago  
207B Sunset Blvd. N.  
Renton, WA 98057

Attorneys for Plaintiff

*/s/ Robert E. Sabido*

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Robert E. Sabido