

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

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US DOMINION, INC. et al.,	)	
	)	
Plaintiffs,	)	Case No. 1:21-cv-00445-CJN
	)	Judge Carl J. Nichols
v.	)	
	)	
MY PILLOW, INC. et al.,	)	
	)	
Defendants.	)	
	)	

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**MOTION TO WITHDRAW AS COUNSEL OF RECORD FOR DEFENDANTS MY  
PILLOW, INC. AND MICHAEL J. LINDELL**

Pursuant to Local Civil Rule 83.6(c), Andrew Parker, Joseph Pull, Elizabeth Wright, Abraham Kaplan, Ryan Malone, and the law firm of Parker Daniels Kibort LLC (collectively “PDK”) hereby respectfully submit this Motion to Withdraw as Counsel of Record for Defendants in the above-captioned matter.<sup>1</sup> Nathan Lewin and the law firm of Lewin & Lewin, LLP join the Motion with respect to their own representation of My Pillow, Inc.

The reasons for this Motion are set forth in the Memorandum of Law and the Declaration of Andrew D. Parker filed herewith. In support of this Motion, the undersigned further states:

1. Defendants are millions of dollars in arrears to PDK;
2. Defendants are unable to get out of arrears and will be unable to pay for future fees and costs;
3. PDK is unable to finance Defendants’ litigation without placing itself at serious and substantial financial risk;

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<sup>1</sup> Attorney Matthew Eslick is no longer with Parker Daniels Kibort LLC and therefore no longer represents Defendants. Mr. Eslick should be removed as counsel of record from the docket.

4. This Motion is not made for purposes of delay;
5. Defendants have been notified that PDK intends to withdraw;
6. PDK has discussed its intention to withdraw and the reason therefore with Defendants. In response, Defendants stated that they will not oppose this motion and understand the need to withdraw due to lack of funds;
7. There is minimal prejudice to any of the parties as discovery has not closed and no trial date is scheduled.
8. Mr. Lewin's representation of My Pillow, Inc. is dependent upon PDK's representation. My Pillow, Inc. owes Mr. Lewin's firm funds as well.

PDK discussed this motion with counsel for the Dominion parties on October 5, 2023, pursuant to Local Civil Rule 7(m). Counsel for the Dominion parties stated that they did not at this time have a position concerning the motion, but would notify PDK when they had a position. PDK will provide the Court with an update when it learns the Dominion parties' position concerning the motion.

WHEREFORE, Counsel respectfully requests the Court grant their request to withdraw from the case.

Respectfully submitted,

DATED: October 5, 2023.

**PARKER DANIELS KIBORT LLC**

By /s/ Andrew D. Parker

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