IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WISCONSIN

KHARY PENEBAKER, MARY ARNOLD, and BONNIE JOSEPH,

Plaintiffs,

v.

Case No. 3:22-cv-334

ANDREW HITT, ROBERT F. SPINDELL, JR., BILL FEEHAN, KELLY RUH, CAROL BRUNNER, EDWARD SCOTT GRABINS, KATHY KIERNAN, DARRYL CARLSON, PAM TRAVIS, MARY BUESTRIN, JAMES R. TROUPIS, and KENNETH CHESEBRO,

Defendants.

DEFENDANT JAMES R. TROUPIS'S NOTICE OF MOTION AND MOTION TO DISQUALIFY STAFFORD ROSENBAUM LLP AS PLAINTIFFS' COUNSEL

PLEASE TAKE NOTICE that Defendant James R. Troupis, by and through his attorneys, Cramer, Multhauf & Hammes, LLP and Graves Garrett LLC, moves the Court for an order disqualifying Stafford Rosenbaum LLP ("Stafford") as Plaintiffs' counsel in this matter. Disqualification is proper because Stafford, as Troupis's current counsel, has a concurrent conflict of interest in representing Plaintiffs in this litigation. Alternatively, if the Court deems Stafford to be Troupis's former counsel, disqualification is proper because there is a conflict between Troupis, Stafford, and Plaintiffs. This Motion is supported by the accompanying brief and declaration of James R. Troupis, the facts and arguments of which are incorporated as if explicitly stated herein.

WHEREFORE, Defendant James R. Troupis respectfully requests that this Court enter an order disqualifying Stafford Rosenbaum LLP as Plaintiffs' counsel, and for such other and further relief as this Court deems just and necessary.

Dated this 13th day of July, 2022.

CRAMER, MULTHAUF & HAMMES, LLP

Attorneys for Defendant, James R. Troupis

BY: Electronically signed by Matthew M. Fernholz

MATTHEW M. FERNHOLZ (State Bar No.: 1065765) ASHLEY E. McNULTY (State Bar No.: 1107355)

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> BY: <u>Electronically signed by Edward D. Greim</u> EDWARD D. GREIM, Pro Hac Vice Forthcoming

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