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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|--|---|------------------------------------|
| UNITED BRANDS AND MARKETING INTERNATIONAL S.ÀR.L, | : | |
| | : | |
| Plaintiff, | : | |
| v. | : | Civil Action No. 2:25-cv-03046-GAW |
| PROHASHING, LLC, | : | |
| | : | |
| Defendant. | : | |
| | : | |
| | : | |

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL
FOR PLAINTIFF**

Andrew Bull, Tyler Hartcraft, and Charles Scrimalli, hereby respectfully move for leave of Court to withdraw as counsel for Plaintiff United Brands and Marketing International S.ÀR.L (“UBMI”) in the above-captioned matter, and state as follows:

1. The Pennsylvania Rules of Professional Conduct provide that an attorney may withdraw as counsel under certain circumstances.
2. Good cause exists for withdrawal because UBMI has failed to fulfill its financial obligations to undersigned counsel regarding legal services rendered in this matter, despite

repeated invoices and requests for payment, and continued representation would impose an unreasonable financial burden on undersigned counsel.¹

3. UBMI has been advised of this Motion and of its responsibility to secure new counsel or to proceed pro se if the Court grants this Motion, and has been provided reasonable notice of upcoming deadlines and Court dates.

4. Counsel requests that the Motion to Withdraw be granted so that counsel will no longer represent Plaintiff in this matter.

WHEREFORE, undersigned counsel respectfully requests that the Court enter the attached Order granting leave to withdraw as counsel for UBMI in this matter.

Dated: December 30, 2025

Respectfully submitted,

By: /s/ Andrew Bull
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Attorneys for Plaintiff

¹ If necessary and required by the Court, the undersigned counsel would explain this in further detail *in camera*.

CERTIFICATE OF SERVICE

I hereby certify that on December 30, 2025, I served the above Motion for Leave to Withdraw as Counsel for Plaintiff electronically by filing the aforementioned documents using the Court's ECF system.

By: /s/ Andrew Bull
Andrew Bull (PA No. 323989)

Counsel for Plaintiff