

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

TYLER ADAMS, et al.
Plaintiffs

v.

NO. 1:21-cv-11686-FDS

**MASS GENERAL BRIGHAM
INCORPORATED,**
Defendant

DECLARATION OF RYAN P. MCLANE

I, Ryan P. McLane, Esq., hereby declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney licensed in the Commonwealth of Massachusetts.
2. I am lead counsel for the Plaintiffs in the above matter, including Michelle Orfanos.
3. In accordance with Mass. R. Prof. C. 1.16 and 1.7, I believe that good cause exists to terminate my representation of Plaintiff Michelle Orfanos, in that we have a fundamental disagreement over trial strategy and there exists other good cause, which I could inform the Court, *in camera*, if the Court so wishes.
4. The client would not be adversely affected by the withdrawal in a material way, as I sent an email to Ms. Orfanos on October 25, 2023 indicating that I would file this motion in thirty days, and in the interim continued representation and provided her the necessary Phase II written discovery materials and guidance on responding to the same. Additionally, Phase II

written discovery deadline is December 27, 2023, giving Ms. Orfanos additional time to complete the discovery and find new counsel (a total of sixty days).

5. Further, Ms. Orfanos is equipped to complete discovery and I would work with opposing counsel to schedule her deposition enough in advance to allow her even more time to find new counsel.
6. Based on the nature of this case and the amount of plaintiffs involved, and given the seriousness of the breakdown of the attorney/client relationship, I do not believe that I can represent Ms. Orfanos in the manner in which she expects me to, and also adequately represent the remaining plaintiffs.
7. This case began with 267 plaintiffs. After this Court indicated that it would dismiss the unincorporated association “Together Employees” after the denial of preliminary injunctive relief, many plaintiffs decided not to pursue their claims individually, resulting in 223 individually named plaintiffs listed in the Amended Complaint. After Phase I summary judgment, 159 Plaintiffs are still in litigation.
8. Attorney Bradford and I have dedicated hundreds of hours into this case, taking great pains to zealously represent each individual plaintiff and to ensure that they understand the nature of each stage of litigation.
9. The hearings speak for themselves, as well over 100 participants are frequently on the remote hearings via zoom.
10. I am confident that we have satisfied our obligations to Ms. Orfanos under

the Massachusetts Rules of Professional Conduct and that this Motion to Withdraw is necessary to the effective prosecution of this case and the remaining plaintiffs' claims.

November 27, 2023

A handwritten signature in black ink, appearing to read 'R. McLane', written above a horizontal line.

Ryan P. McLane, Esq.