

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

ZHAOYIN WANG,
Plaintiff,

v.

BETA PHARMA, INC., DON ZHANG,
AND ZHEJIANG BETA PHARMA
CO., LTD.,
Defendants.

No. 3:14CV1790 (VLB)

April 21, 2015

MOTION TO DISQUALIFY OPPOSING COUNSEL

Defendants Beta Pharma, Inc. ("Beta Pharma") and Don Zhang (collectively "Defendants") hereby move to disqualify Jonathan Katz, Esq. ("Katz"), the attorney currently representing plaintiff Zhaoyin Wang ("Plaintiff"), from representing Plaintiff in this action. Defendants file herewith a Memorandum of Law with exhibits in support of this Motion. As set forth fully in that Memorandum, Katz teamed up with Lance Liu, Esq. ("Liu"), Defendants' former lawyer, who counseled Defendants on the very matters at issue in this case. Katz's associations with Liu have created multiple opportunities for Liu to disclose Defendants' confidential and privileged information to Katz. The governing caselaw establishes that an attorney in a civil action should be disqualified if he has consulted with an attorney who changed sides. Thus, Katz must be disqualified from representing Plaintiff.

ORAL ARGUMENT REQUESTED

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WHEREFORE, Defendants respectfully request that the Court grant their Motion and order the following relief:

- 1. Disqualification of Katz from representing plaintiff Zhaoyin Wang in this case; and**
- 2. An injunction precluding Katz from turning over his file(s) associated with this matter to any other lawyer or law firm.**

**DEFENDANTS BETA PHARMA, INC. AND
DON ZHANG,**

By: /s/

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CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2015 a copy of the foregoing was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/

Michael G. Caldwell (ct 26561)