UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON

Sonosuite SL, a Spanish limited liability company v. Rhapsody International Inc., a Delaware Corporation

Sonosuite SL v. Rhapsody International Inc. · No. 2:24-cv-00844-JNW · Decided December 9, 2025

SUMMARY

The United States District Court for the Western District of Washington orders Defendant Rhapsody International Inc. to appear through licensed counsel and show cause why its answer should not be stricken and default entered after prior counsel withdrew. The Court renotes the plaintiff's motion for entry of default and sets deadlines for Rhapsody to obtain counsel and respond.

CASE DETAILS

COURT	United States District Court for the Western District of Washington
WRITING FOR THE COURT	Jamal N. Whitehead
JURISDICTION	United States District Court for the Western District of Washington
DECIDED	December 9, 2025
DOCKET	2:24-cv-00844-JNW
DISPOSITION	other
PROCEDURAL POSTURE	After defense counsel withdrew and the corporate defendant failed to obtain substitute counsel in compliance with the Court's order, the Court ordered the defendant to appear through licensed counsel and show cause why its answer should not be stricken and default entered.
PRECEDENTIAL VALUE	unknown

TOPICS

default · sanctions · civil procedure · commercial litigation · corporate law

PRACTICE AREAS

civil procedure · commercial litigation · corporate law

QUESTIONS PRESENTED

1. Whether a corporation may proceed in federal court without licensed counsel after its attorney withdraws.
2. Whether the Court may require a corporation that remains unrepresented after an order to obtain substitute counsel to show cause why its answer should not be stricken and default entered as a sanction.

HOLDINGS

1. A corporation may not appear pro se in federal court and must appear through licensed counsel.
2. The Court may consider entry of default against a corporate defendant that fails to obtain substitute counsel and participate in the litigation after being ordered to do so, but the defendant must first be given an opportunity to show cause and due process must be respected.

KEY QUOTATIONS

> *"It is a longstanding rule that '[c]orporations and other unincorporated associations must appear in court through an attorney.'"* (at 1)

> *"Courts have inherent equitable powers to dismiss actions or enter default judgments for failure to prosecute, contempt of court, or abusive litigation practices."* (at 2)

> *"The need for orderly administration of justice does not permit violations of due process."* (at 2)

FACTUAL BACKGROUND

Rhapsody International Inc. is a corporation whose counsel withdrew after the Court granted an unopposed motion to withdraw. The Court previously ordered Rhapsody to obtain substitute counsel, but Rhapsody remained without counsel. Because Rhapsody had already filed an answer, the Court treated entry of default as a potential sanction for failure to comply with the order and participate in the litigation, subject to an opportunity to show cause.

PROCEDURAL HISTORY

Rhapsody filed an answer while represented by counsel. The Court granted defense counsel's unopposed motion to withdraw on September 19, 2025, ordered Rhapsody to obtain substitute counsel within 30 days, and warned that noncompliance could result in default and default judgment. Rhapsody remained unrepresented, so the Court ordered it to appear through licensed counsel and show cause by December 23, 2025, while renoting SonoSuite's motion for entry of default to December 30, 2025.

DISPOSITION

other

CASES CITED

- D-Beam Ltd. P'ship v. Roller Derby Skates, Inc., 366 F.3d 972, 973-74 (9th Cir. 2004)
- Licht v. Am. W. Airlines, 40 F.3d 1058, 1059 (9th Cir. 1994)

- Emp. Painters' Tr. v. Ethan Enters., Inc., 480 F.3d 993, 998 (9th Cir. 2007)
- Butscher v. Moore, 611 F. App'x 456, 457 (9th Cir. 2015)
- TeleVideo Sys., Inc. v. Heidenthal, 826 F.2d 915, 916 (9th Cir. 1987)

OPINION

Sonosuite SL, a Spanish limited liability company v. Rhapsody International Inc., a Delaware Corporation
PER CURIAM.
1 2 3 4 5
UNITED STATES DISTRICT COURT
6 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE
7 SONOSUITE SL, a Spanish limited CASE NO. 2:24-cv-00844-JNW 8 liability company,
ORDER
9 Plaintiff, 10 v.
11 RHAPSODY INTERNATIONAL INC.,
a Delaware Corporation, 12 Defendant. 13 14 On September 19, 2025, the Court granted Hollystone Laws' unopposed 15 motion to withdraw as counsel for Defendant Rhapsody International Inc., which 16 left Rhapsody unrepresented. Dkt. No. 20. As corporations may not appear pro se in 17 federal court, the Court ordered substitute counsel to appear within 30 days. Id. at 18 2; D-Beam Ltd. P'ship v. Roller Derby Skates, Inc., 366 F.3d 972, 973–74 (9th Cir. 19 2004) (quoting Licht v. Am. W. Airlines, 40 F.3d 1058, 1059 (9th Cir.1994) ("It is a 20 longstanding rule that '[c]orporations and other unincorporated associations must 21 appear in court through an attorney.'"). The Court warned Rhapsody that failure to 22 obtain substitute counsel may result in entry of default and default judgment 23 1 against it. Dkt. No. 20 at 2; see also Emp. Painters' Tr. v. Ethan Enters., Inc., 480 2 F.3d 993, 998 (9th Cir. 2007) (finding default against corporation proper because 3 the corporation failed to obtain new counsel after its counsel withdrew). 4 Because Rhapsody filed an answer before its counsel withdrew, entry of 5 default is appropriately ordered as a sanction for failure to comply with the Court's 6 prior order and to participate in the litigation. See Butscher v. Moore, 611 F. App'x 7 456, 457 (9th Cir. 2015); see also TeleVideo Sys., Inc. v. Heidenthal, 826 F.2d 915, 8 916 (9th Cir. 1987) ("Courts have inherent equitable powers to dismiss actions or 9 enter default judgments for failure to prosecute, contempt of court, or abusive 10 litigation practices."). While such sanctions under the Court's inherent powers are 11 "necessary to enable the judiciary to function," they are not limitless. TeleVideo 12 Sys., Inc., 826 F.2d at 916. Indeed, "[t]he need for orderly administration of justice 13 does not permit violations of due process." Id. 14 Accordingly, the Court ORDERS Defendant Rhapsody to appear through 15 licensed counsel and to show cause why the Court should not strike its answer and 16 direct the Clerk of the Court to enter default against it by no later than

17 December 23, 2025. To ensure Rhapsody has sufficient time to find new counsel and
18 appear, the Court RENOTES SonoSuite's motion for entry of default to December 19 30, 2025.
20 21 22 23 1 The Clerk of the Court is DIRECTED to enter this order and to mail a copy to 9
Defendant Rhapsody International Inc.'s address on file. 3 Dated this 9th day of December, 2025.
fake — 5 amal N. Whitehead United States District Judge 6 7 8 9 10 11 12 13 14 15 16 17 18 19
20 21 22 23

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