

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)

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