Case Number: HG11558324

Order After Hearing Re: of 05/19/2011

DECLARATION OF SERVICE BY MAIL

I certify that I am not a party to this cause and that a true and correct copy of the foregoing document was mailed first class, postage prepaid, in a sealed envelope, addressed as shown on the foregoing document or on the attached, and that the mailing of the foregoing and execution of this certificate occurred at 1225 Fallon Street, Oakland, California.

Executed on 05/23/2011.

Executive Officer / Clerk of the Superior Court

By Duerus

Law Offices Of James M. McCabe Attn: McCabe, James M. 4817 Santa Monica Avenue Suite B San Diego, CA 92107

Superior Court of California, County of Alameda Rene C. Davidson Alameda County Courthouse

Doe Plaintiff/Petitioner(s) VS.	No. <u>HG11558324</u> Order
The Watchtower Bible and Tract Society of New York, I	Demurrer to Complaint Overruled
Defendant/Respondent(s) (Abbreviated Title)	

The Demurrer to Complaint was set for hearing on 05/19/2011 at 03:00 PM in Department 22 before the Honorable Robert McGuiness. The Tentative Ruling was published and has not been contested.

IT IS HEREBY ORDERED THAT:

The tentative ruling is affirmed as follows: The Demurrer of Defendants Watchtower Bible and Tract Society of New York, Watchtower Bible and Tract Society of Pennsylvania, Inc., Jehovah's Witnesses on Peralta Blvd., Fremont, and Kingdom Hall of Jehovah's Witnesses ("Defendants") to the Complaint is OVERRULED. Plaintiff Jane Doe ("Plaintiff") has sufficiently alleged facts to support a duty by Defendants to Plaintiff in order to support this negligence claim. (See Juarez v. Boy Scouts of America, Inc. (2000) 81 Cal.App.4th 377.)

The Court notes that in Defendants' moving papers, Defendants cite to out-of-state cases, but have not provided copies of such cases. In the future, Defendants should comply with Cal. Rules of Court, Rule 3.1113(i).

Defendants shall file and serve an answer to the Complaint within 20 days, which time shall run from service of notice of entry of this order by Plaintiff.

Dated: 05/19/2011

Judge Robert McGuiness

Jackson Lewis LLP, Attn: Schnack, Robert J 801 K Street Suite 2300 Sacramento, CA 95814

Superior Court of California, County of Alameda Rene C. Davidson Alameda County Courthouse

Doe Plaintiff/Petitioner(s) VS.	No. <u>HG11558324</u> Order
The Watchtower Bible and Tract Society of New York, I	Motion to Amend Complaint Granted
Defendant/Respondent(s) (Abbreviated Title)	

The Motion to Amend Complaint was set for hearing on 05/03/2012 at 03:00 PM in Department 22 before the Honorable Robert McGuiness. The Tentative Ruling was published and has not been contested.

IT IS HEREBY ORDERED THAT:

The tentative ruling is affirmed as follows: The motion of Jane Doe to file amended complaint adding punitive damage allegations against defendant Watchtower Bible and Tract Society ("Watchtower") under CCP 425.14 is GRANTED.

Plaintiff filed this motion on April 10, 2012, just six weeks before the trial date of May 21, 2012. Plaintiff did not delay unduly in filing this motion, and Watchtower has not identified any specific liability or fact discovery that it will need from Plaintiff as a result of the addition of the punitive damages allegations.

Under CCP 425.14, a plaintiff cannot assert a claim for punitive damages against a religious corporation until the court finds that the plaintiff has presented sufficient evidence of a prima facie showing of liability under the preponderance of evidence standard and a showing of recklessness, oppression or fraud under the clear and convincing standard. Little Co. of Mary Hosp. v. Superior Court (2008) 162 Cal.App.4th 261, 267, 271; Rowe v. Superior Court (1993) 15 Cal.App.4th 1711, 1723

The proposed First Amended Complaint includes a third cause of action entitled "Acts of Malice." The court reads the cause action as a claim that defendant Watchtower is liable for negligence because it acted with a willful and conscious disregard of the rights or safety of others. (Civil Code 3294(c)(1).) To establish conscious disregard, plaintiff must show that the defendant was aware of the probable dangerous consequences of its conduct, and that he willfully and deliberately failed to avoid those consequences. (Hoch v. Allied Signal (1994) 24 Cal.App.4th 48, 61.)

Plaintiff has presented a prima facie showing that she could potentially prove a claim against Watchtower for negligence by a preponderance of the evidence. There is evidence that Watchtower's officers, directors, or managing agents knew or had reason to know in 1993 that Jonathan Kendrick had confessed to inappropriate touching of a child (PX 2; DX L and M), that Watchtower failed to notify the congregation or to take other measures to protect children in the church (PX 3 and 4; DX K), and that as a result plaintiff suffered injury from 1994 through 1996.

Plaintiff has presented a prima facie showing that she could potentially prove by clear and convincing evidence that Watchtower was aware of the probable dangerous consequences of its decision not to alert church members of Kendrick's dangerous tendencies, and that Watchtower willfully and deliberately failed to avoid those consequences. (PX 2, 3, 4.)

Watchtower raises the issue of the appropriate balance between the clergy-penitent privilege and appropriate disclosures to congregants that a member may be a threat to children. Watchtower also notes that most of the case law on the responsibility of entities for sexual abuse concerns abuse perpetrated by employees or agents rather than by member of the entity who were not in positions of authority at the time of the abuse. (But see Wallace v. Der-Ohanian (1962) 199 Cal.App.2d 141.) These concerns present fact specific issues that are beyond the scope of a motion where the plaintiff need only present sufficient evidence to establish a prima facie case of liability and punitive damages.

The court OVERRULES the objection to PX 27 (percipient witness), to PX 26 (percipient witness to statements by Kendrick), to PX 30 (offered as evidence that Watchtower was on notice, not for truth of matter asserted), PX 31 (admissible to extent based on personal knowledge, but court disregards testimony regarding the "true purpose" of Watchtower), and PX 32 (witness is arguably a qualified expert with pertinent information regarding the standard of care during the relevant time period).

The motion of Jane Doe for an order permitting financial discovery is DENIED. If the jury finds that Watchtower is liable for punitive damages, then the court will expect Watchtower to produce its pertinent financial information by 9:00 am the following morning and to have witnesses available to testify by the following day.

Plaintiff must file the proposed First Amended Complaint on or before May 11, 2012.

The Court further orders the parties to comply with the Pretrial Orders: File Motions in Limine and related documents by May 16, 2012 at 2:30 p.m.

SHORT TITLE:	CASE NUMBER:
Doe VS The Watchtower Bible and Tract Society of New York, I	HG11558324

ADDITIONAL ADDRESSEES

Jackson Lewis LLP, Attn: Schnack, Robert J 801 K Street Suite 2300 Sacramento, CA 95814_____

Jonathan Kendrick 200 Honey Lane Oakley, CA 94561

Case Number: HG11558324

Order After Hearing Re: of 05/03/2012

DECLARATION OF SERVICE BY MAIL

I certify that I am not a party to this cause and that a true and correct copy of the foregoing document was mailed first class, postage prepaid, in a sealed envelope, addressed as shown on the foregoing document or on the attached, and that the mailing of the foregoing and execution of this certificate occurred at 1225 Fallon Street, Oakland, California.

Executed on 05/14/2012.

Executive Officer / Clerk of the Superior Court

By Miranda Edgaly

Deputy Clerk

Law Offices Of James M. McCabe Attn: McCabe, James M. 4817 Santa Monica Avenue Suite B San Diego, CA 92107

Superior Court of California, County of Alameda Rene C. Davidson Alameda County Courthouse

Doe Plaintiff/Petitioner(s) VS.	No. <u>HG11558324</u> Order
The Watchtower Bible and Tract Society of New York, I	Motion to Compel Further Answers at Deposition Granted
Defendant/Respondent(s) (Abbreviated Title)	

The Motion to Compel Further Answers at Deposition was set for hearing on 09/29/2011 at 03:00 PM in Department 22 before the Honorable Robert McGuiness. The Tentative Ruling was published and has not been contested.

IT IS HEREBY ORDERED THAT:

The tentative ruling is affirmed as follows: The Motion of Plaintiff Jane Doe to Compel Answers to Questions at Deposition of Gary Abrahamson and for Sanctions is GRANTED. Plaintiff has established that the information sought is not precluded from disclosure under the penitent-clergy privilege, Evidence Code \$1031-1034 because the questions do not appear to call for communications that were presumed to be kept confidential with only the clergy member to whom they were communication. Instead, the questions appear to call for information and communications of a kind that would be expected to be communicated beyond that clergy member to others within the religious organization, i.e. a judicial investigating committee, for purposes of taking responding to the communication within the church. (Cf. Roman Catholic Archbishop of Los Angeles v. Superior Court (2005) 131 Cal.App.4th 417, 445-46.)

Defendant shall present Gary Abrahamson for further deposition and shall not instruct him not to answer the questions identified in the motion based upon clergy-penitent privilege. The further deposition shall take place at a mutually-convenient time, but no later than 20 days after entry of this order.

The request for sanctions in connection with this motion is DENIED.

Dated: 09/29/2011

Ludge Pehert McGuiness

Judge Robert McGuiness

Case Number: HG11558324

Order After Hearing Re: of 09/29/2011

DECLARATION OF SERVICE BY MAIL

I certify that I am not a party to this cause and that a true and correct copy of the foregoing document was mailed first class, postage prepaid, in a sealed envelope, addressed as shown on the foregoing document or on the attached, and that the mailing of the foregoing and execution of this certificate occurred at 1225 Fallon Street, Oakland, California.

Executed on 10/05/2011.

Executive Officer / Clerk of the Superior Court



James M. McCabe The McCabe Law Firm 4817 Santa Monica Ave. San Diego, CA 92107

Superior Court of California, County of Alameda Rene C. Davidson Alameda County Courthouse

Doe Plaintiff/Datitionar(a)	No. <u>HG11558324</u>
Plaintiff/Petitioner(s) VS.	Order
The Watchtower Bible and Tract Society of New	Motion to Compel Production of Documents Granted
York, I	
Defendant/Respondent(s) (Abbreviated Title)	

The Motion to Compel Production of Documents filed for Jane Doe was set for hearing on 10/03/2011 at 03:00 PM in Department 22 before the Honorable Robert McGuiness.

The matter was argued and submitted, and good cause appearing therefore,

IT IS HEREBY ORDERED THAT:

Pursuant to the court's prior order in this matter, it conducted an in camera review of two letters dated respectively, November 15, 1993 and December 3, 1993, to determine whether the same were (are) privileged communications within the application of Evidence Code section 1034 and related statutes. After review, the court determines that the letters are not privileged and plaintiff's motion to compel production is granted. However, the court will withhold production of the subject letters and they shall remain under seal until November 17, 2011 so as to allow defendants time to consider and seek appellate review here. The court has determined this matter largely within the context of the holding of Roman Catholic Diocese of Los Angeles v. Superior Court, 131 Cal. App. 4th 417. The record there and here demonstrate that the communications were likely to be shared with more than one person; persons other than elders would be likely to consider same and that the penitent (defendant Kendrick) did not expect the communications to be kept confidential (under the circumstances related and presented).

Dated: 10/17/2011

Judge Robert McGuiness

Case Number: HG11558324

Order After Hearing Re: of 10/17/2011

DECLARATION OF SERVICE BY MAIL

I certify that I am not a party to this cause and that a true and correct copy of the foregoing document was mailed first class, postage prepaid, in a sealed envelope, addressed as shown on the foregoing document or on the attached, and that the mailing of the foregoing and execution of this certificate occurred at 1225 Fallon Street, Oakland, California.

Executed on 10/17/2011.

Executive Officer / Clerk of the Superior Court

By Rastry Mc Eccudigital

Case Number: HG11558324

Order After Hearing Re: of 10/17/2011

DECLARATION OF SERVICE BY MAIL

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Executed on 10/17/2011.

By Deputy Clerk

	Doe	No. HG11558324
	Plaintiff/Petit	tioner(s)
	VS.	Minutes
The Watchtower	Bible and Tract Society of	New
	York, I	1 (2)
,	Defendant/Respon Abbreviated Title)	ondent(s)
	Abbieviated Title)	
Department 22	Hon	norable Robert McGuiness , Judg
Cause called for Mo	otion: October 03, 2011.	
No parties expected		
Documents received	1 10/03/2011.	
Ruling on Motion to	Compel Production of Docu	ments Taken Under Submission
	3/2011 3/2011	
Ву _	Executive Officer / Clerk Yashy McCica digital	
		Deputy Clerk

Jackson Lewis LLP, Attn: Schnack, Robert J 801 K Street Suite 2300 Sacramento, CA 95814

Superior Court of California, County of Alameda Rene C. Davidson Alameda County Courthouse

Doe Plaintiff/Petitioner(s) VS.	No. <u>HG11558324</u> Order
The Watchtower Bible and Tract Society of New York, I	Motion to Vacate/Set Aside Granted
Defendant/Respondent(s) (Abbreviated Title)	

The Motion to Vacate/Set Aside was set for hearing on 01/19/2012 at 03:00 PM in Department 22 before the Honorable Robert McGuiness. The Tentative Ruling was published and was contested.

The matter was argued and submitted, and good cause appearing therefore,

IT IS HEREBY ORDERED THAT:

The tentative ruling is affirmed as follows: The Motion of Jonathan Kendrick for relief from default is GRANTED.

The court is concerned that the evidence suggests that Mr. Kendrick was aware of the lawsuit, had consulted with counsel, and was possibly aware that he was required to file a responsive pleading yet failed to do so within the allotted time. The court also notes that the motion was filed shortly after the default, which mitigates any prejudice to the Plaintiff, that counsel for Plaintiff did not did not provide notice to Plaintiff before taking the default, Kim v. Westmoore Partners, Inc. (2011) 201 Cal. App. 4th 267, 271 fn 1, and that there is a strong policy preference in favor of resolving cases on their merits, Fasuyi v. Permatex, Inc. (2008) 167 Cal. App. 4th 681, 696. Weighing these factors, the court finds that defendant Mendrick has made the "very slight" showing required for excusable neglect and grants the relief requested under CCP 473(b).

Because of the significant evidence that Mr. Kendrick was aware that he was required to file a responsive pleading, the court makes the grant of this motion conditional on Mr. Kendrick paying Plaintiff \$1000 for the fees that plaintiff incurred as a result of Mr. Kendrick's failure to file a timely answer. Vanderkous v. Conley (2010) 188 Cal. App. 4th 111, 118-119.

Defendant Kendrick must file the proposed answer on or before January 26, 2012.

Dated: 01/19/2012 Judge Robert McGuiness

SHORT TITLE:	CASE NUMBER:
Doe VS The Watchtower Bible and Tract Society of New York, I	HG11558324

ADDITIONAL ADDRESSEES

Jackson Lewis LLP, Attn: Schnack, Robert J 801 K Street Suite 2300 Sacramento, CA 95814____

Case Number: HG11558324

Order After Hearing Re: of 01/19/2012

DECLARATION OF SERVICE BY MAIL

I certify that I am not a party to this cause and that a true and correct copy of the foregoing document was mailed first class, postage prepaid, in a sealed envelope, addressed as shown on the foregoing document or on the attached, and that the mailing of the foregoing and execution of this certificate occurred at 1225 Fallon Street, Oakland, California.

Executed on 01/20/2012.

Executive Officer / Clerk of the Superior Court

By Siam William digital



ALAMEDA COUNTY

JACKSON LEWIS LLP Robert J. Schnack (SBN 191987) 801 K Street, Suite 2300 Sacramento, CA 95814 Telephone: (916) 341-0404 (916) 341-0141 Facsimile:

Attorney for Defendant WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA COUNTY OF ALAMEDA

JANE DOE,

Plaintiff,

THE WATCHTOWER BIBLE AND TRACT

YS.

SOCIETY OF NEW YORK, INC., a corporation; THE WATCHTOWER BIBLE AND TRACT SOCIETY OF 17 PENNSYLVANIA, a corporation; THE GOVERNING BODY OF JEHOVAH'S 18 WITNESSES, an unincorporated association; JEHOVAH'S WITNESSES ON PERALTA BLVD. FREMONT, an entity; KINGDOM 20 HALL OF JEHOVAH'S WITNESSES, a corporation; JONATHAN KENDRICK, an 21 individual; and ROES 1 to 10,

Defendants.

Case No.: HG11558324

STIPULATION TO CONTINUE PRE- (V TRIAL CONFERENCE; PROPOSED ORDER

Pre-Trial Conference: May 4, 2012

Trial: May 21, 2012

Plaintiff and defendants, through their undersigned counsel of record, all hereby stipulate S/R/II S:30 Mto continue the pretrial conference set for May 4, 2012 to May=11, 2012, should the Court agree 27|| to do so. The parties are NOT requesting that trial set for May 21, 2012 be continued.

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STIPULATION TO CONTINUE PRE-TRIAL CONFERENCE; [PROPOSED] ORDER

1	Date: March <u>27</u> , 2012	JACKSON LEWIS LLP
2		By: Robert J. Schnack
3		
4		Attorneys for Defendant WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK
2		የተገኝ ሂደን እ <i>ለ «የግ ሊ ፕ</i> ንሃመስያ ' ል ፕኝን ፓንያንን እ <i>ለ</i> '' ል ፕን <i>ር</i> ፕ
9	Date: March <u>ZZ</u> , 2012	THE McCABELAW FIRM, APC
8		By: James M. McCabe
9		Attorneys for Defendant NORTH CONGREGATION
10	·	»—» • • • • • • • • • • • • • • • • • •
11 12	Date: March, 2012	FURTADO, JASPOVICE & SIMONS
13		By:
14		Rick Simons
15		Attorneys for Plaintiff JANE DOE
16		
17	Date: March, 2012	STONE & GRAVES
18		By:
19		Eric Graves
20		Attorneys for Defendant JONATHAN KENDRICK
21		<u>ORDER</u>
22	Rosad on the forcesing oficeristics	and Athensies finding good games therefor
23	•	and otherwise finding good cause therefor,
24	IT IS HEREBY ORDERED, that the Pre-T	rial Conference previously scheduled for May 4, 2012
25	has been continued to May 11, 2012 at 8:30	0 a.m. in Department 22.
26	IT SO ORDERED.	
27	DATED: <u>>/ 2/6</u> , 2012	Honorable Robert McGuiness
28		Judge of the Superior Court
		-2-
	II STIPULATION TO CONTINUE PI	RE-TRIAL CONFERENCE; [PROPOSED] ORDER

		•
1	Date: March, 2012 . JAC	KSON LEWIS LLP
2	2 	
3	3	Robert J. Schnack
4	Atto	rneys for Defendant WATCHTOWER BIBLE O TRACT SOCIETY OF NEW YORK
6	Date: March, 2012 THE	E McCABE LAW FIRM, APC
7		•
. 8	By:_	James M. McCabe
9	# 1	rneys for Defendant RTH CONGREGATION
10		
11	1!	TADO, JASPOVICE & SIMONS
12		
13	By:_	Rick Simons
14	- 14	rneys for Plaintiff JANE DOE
15		
16	£ 3	NE & GRAVES
17	7	
18	By:_	Eric Graves,
19		
20	ρ	orneys for Defendant JONATHAN KENDRICK
21	1 ORD	<u>ER</u>
22	Based on the foregoing stipulation and of	hermise finding good cause therefor
23	3	
24		
25	has been continued to May 11, 2012 at 8:30 a.m.	in Department 22.
26	IT'SO ORDERED.	
27	DATED:, 2012	
28	χ · · · · · · · · · · · · · · · · ·	Honorable Robert McGuiness Judge of the Superior Court
20		2 -
	STIPULATION TO CONTINUE PRE-TRI	AL CONFERENCE; [PROPOSED] ORDER

CLERK'S CERTIFICATE OF SERVICE BY MAIL

CASE NAME: JANE DOE VS THE WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC., et al

ACTION NO.: HG11-558324

 $ar{x}$, $ar{x}$

I am a Deputy Clerk employed by the Alameda County Superior Court. I am over the age of 18 years. My business address is 1221 Oak Street, Oakland, California. I served the **STIPULATION AND ORDER TO CONTINUE PRETRIAL CONFERENCE** by placing copies in envelopes addressed as shown below and then by sealing and placing them for collection, stamping or metering with prepaid postage, and mailing on the date stated below, in the United States mail at Alameda County, California, following standard court practices.

Richard J. Simons, Esq. Furtado, Jaspovice & Simons 22275 Main Street Hayward, CA 94541 Robert J. Schnack

JACKSON LEWIS LLP

801 K Street, Suite 2300

Sacramento, CA 95814

The McCabe Law Firm, APC James M. McCabe, Esq. 4817 Santa Monica Avenue San Diego, CA 92107

Eric L. Graves, Esq.
Stone & Graves
2377 Gold Meadow Way, Ste 210
Gold River, CA 95670

I declare under penalty of perjury that the following is true and correct

Executed on March 29, 2012 at Oakland, California.

Pat Sweeten

Executive Officer/Clerk of the Superior Court

By Miranda Edgerly, Deputy Clerk

Case Number: HG11558324

Order of 01/13/2012

DECLARATION OF SERVICE BY MAIL

I certify that I am not a party to this cause and that a true and correct copy of the foregoing document was mailed first class, postage prepaid, in a sealed envelope, addressed as shown on the foregoing document or on the attached, and that the mailing of the foregoing and execution of this certificate occurred at 1225 Fallon Street, Oakland, California.

Executed on 01/13/2012.

Executive Officer / Clerk of the Superior Court

By Miranda Edgaly



ALAMEDA COUNTY

CLERK OF THE SUPERIOR COURT

801 K Street, Suite 2300 Sacramento, CA 95814

Telephone: (916) 341-0404 Facsimile: (916) 341-0141

JACKSON LEWIS LLP

Robert J. Schnack (SBN 191987)

Douglas M. Egbert (SBN 265062)

Attorney for Defendant WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA COUNTY OF ALAMEDA

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JANE DOE,

Plaintiff,

YS.

THE WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC., a corporation;

Defendants.

Case No.: HG11558324

STIPULATION TO CONTINUE DEADLINE TO FILE AND SERVE OPPOSITION AND REPLY PAPERS TO MOTION OF PLAINTIFF JANE DOE TO AMEND COMPLAINT AND FOR ORDER PERMITTING FINANCIAL DISCOVERY; [PROPOSED] ORDER

ルジャン Date: 5/3/12 Time: 3:00 p.m.

Dept: 22

BYFAX

Trial: May 21, 2012

Plaintiff and defendant Watchtower Bible and Tract Society of New York, Inc., through their undersigned counsel of record, all hereby stipulate to: (1) continue the deadline for defendant to file and serve its opposition to the Motion of Plaintiff Jane Doe to Amend Complaint and For Order Permitting Financial Discovery to April 27, 2012; and (2) continue the

deadline for plaintiff to file and serve her reply in support of her motion to April 30, 2012.

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STIPULATION TO CONTINUE OPPOSITION AND REPLY DATES; [PROPOSED] ORDER

j	
3	The parties are NOT requesting that the May 3, 2012 hearing on the motion be continued.
2	IT IS SO STIPULATED.
3	Date: April 19, 2012 JACKSON-LEWIS-LLP
4	By:
2	Robert J. Schrack Douglas M. Egbert
7	Attorneys for Defendant WATCHTOWER BIBLE
R	AND TRACT SOCIETY OF NEW YORK
9	Date: March 4/19, 2012 FURTADO, JASPOVICE & SIMONS
10	By:
11	Rick Simons
12	Attorneys for Plaintiff JANE DOE
13	
14	<u>ORDER</u>
15	Based on the foregoing stipulation and otherwise finding good cause therefor,
	•
17	IT IS HEREBY ORDERED that: (1) the deadline for defendant to file and serve its opposition
17 18	•
	to the Motion of Plaintiff Jane Doe to Amend Complaint and For Order Permitting Financial
18	to the Motion of Plaintiff Jane Doe to Amend Complaint and For Order Permitting Financial
18 19 20	to the Motion of Plaintiff Jane Doe to Amend Complaint and For Order Permitting Financial Discovery is continued to April 27, 2012; and (2) the deadline for plaintiff to file and serve her reply in support of her motion is continued to April 30, 2012.
18 19 20	to the Motion of Plaintiff Jane Doe to Amend Complaint and For Order Permitting Financial Discovery is continued to April 27, 2012; and (2) the deadline for plaintiff to file and serve her
18 19 20	
18 19 20 21 22 23	to the Motion of Plaintiff Jane Doe to Amend Complaint and For Order Permitting Financial Discovery is continued to April 27, 2012; and (2) the deadline for plaintiff to file and serve her reply in support of her motion is continued to April 30, 2012. IT SO ORDERED. DATED: 19 2012 Honorable Robert McGuiness
18 19 20 21 22	to the Motion of Plaintiff Jane Doe to Amend Complaint and For Order Permitting Financial Discovery is continued to April 27, 2012; and (2) the deadline for plaintiff to file and serve her reply in support of her motion is continued to April 30, 2012. IT SO ORDERED. DATED: 4/19, 2012
18 19 20 21 22 23	to the Motion of Plaintiff Jane Doe to Amend Complaint and For Order Permitting Financial Discovery is continued to April 27, 2012; and (2) the deadline for plaintiff to file and serve her reply in support of her motion is continued to April 30, 2012. IT SO ORDERED. DATED: 19 2012 Honorable Robert McGuiness

-2-

STIPULATION TO CONTINUE OPPOSITION AND REPLY DATES; [PROPOSED] ORDER

28