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Case #19CV343088
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9 SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA

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12 JANE DOE, a minor, by and through her
13 Guardian ad Litem, John Doe,

14 Plaintiff,

15 vs.

16 UNION SCHOOL DISTRICT, SAMUEL
17 NEIPP, JACQUELINE HORJES, MARY L.
18 BERKEY, CAROLE CARLSON, and ROES
19 1 through 125, inclusive,

20 Defendants.

Case No. 19CV343088

**NOTICE OF MOTION AND MOTION
TO CONSOLIDATE CASES**

Date:

Time: 9:00 am

Dept.: 21

Judge: The Honorable Thang Barrett

21 JANE DOE 2,

22 Plaintiff,

23 vs.

24 UNION SCHOOL DISTRICT, an entity of
25 unknown form; SAMUEL NEIPP, an
26 individual; and DOES 1 through 50,

27 Defendants.

Case No. 19CV343101

1 JANE DOE 1, and JANE DOE 2, a minor, by
2 and through her Guardian ad Litem, Janice
Doe,

Case No. 19CV348167

3 Plaintiffs,

4 vs.

5 UNION SCHOOL DISTRICT, SAMUEL
6 NEIPP, JACQUELINE HORJES, MARY L.
7 BERKEY, CAROLE CARLSON, and ROES
1 through 100, inclusive,

8 Defendants.
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11 TO: UNION SCHOOL DISTRICT [“District”], SAMUEL NEIPP, JACQUELINE HORJES,
12 MARY L. BERKEY, CAROLE CARLSON AND TO THEIR RESPECTIVE ATTORNEYS OF
13 RECORD, AND TO PLAINTIFF JANE DOE 2 AND HER ATTORNEYS OF RECORD:

14 PLEASE TAKE NOTICE that on _____, 2020, at 9:00 AM, or as soon
15 as the matter may be heard, in Department 21 of the above-entitled Court, located at 161 N. 1st
16 Street, San Jose, California, 95112, before the Honorable Thang Barrett, plaintiff JANE DOE,
17 by and through her Guardian ad Litem John Doe [Case No. 19CV343088], will move the Court
18 for an Order consolidating her case with the following actions for all purposes, including trial:

19 • *Jane Doe, a minor, by and through her Guardian ad Litem, John Doe vs. Union*
20 *School District, Samuel Neipp, Jacqueline Horjes, Mary L. Berkey, Carole Carlson, and Roes 1*
21 *through 125, inclusive, Santa Clara County Case No. 19CV343088.*

22 Counsel for Plaintiff: Robert Allard and Lauren A. Cerri, Corsiglia, McMahon & Allard

23 Counsel for Defendants Union School District, Jacqueline Horjes, Mary L. Berkey, Carole
24 Carlson: Kevin Gilbert, Orbach Huff Suarez + Henderson LLP

25 Counsel for Defendant Samuel Neipp: Christopher Schumb

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