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SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA

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

Plaintiff,

vs.

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

Defendants.

Case No. 19CV343088

**DECLARATION OF LAUREN A. CERRI
IN SUPPORT OF MOTION TO
CONSOLIDATE CASES**

Date:

Time: 9:00 am

Dept.: 21

Judge: The Honorable Thang Barrett

I, LAUREN A. CERRI, declare:

1. I am an attorney at law, duly licensed to practice before all courts of the State of California, and am associated in the law firm of Corsiglia, McMahon & Allard LLP, attorneys of record for Plaintiff Jane Doe in Santa Clara County Case No. 19CV343088.

2. This firm also represents Jane Doe 1 and Jane Doe 2 [who will be referenced throughout the litigation as Jane Doe 3 and Jane Doe 4] in their actions against the same defendants, Santa Clara County Case Number 19CV348167.

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3. David Ring and Natalie Weatherford of Taylor & Ring, who represent Jane Doe in Santa Clara County Case Number 19CV343101, advised me via email that they stipulate to consolidation for all purposes.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 26th day of May, 2020 at San Jose, California.



LAUREN A. CERRI