

EXHIBIT A

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

		)
Susana Patricia Stock, an		) CASE NO.:
individual,		)
		) 2:24-cv-01043-
Plaintiff,		) DJC-DMC
		)
v.		)
		)
Board of Trustees of the State		)
University, a State agency;		)
Stephen Perez, an individual;		)
and Does 1-10, inclusive,		)
		)
Defendants.		)
		)

DEPOSITION OF STEPHEN PEREZ
VOLUME I
REMOTELY IN LOS ANGELES, CALIFORNIA
MONDAY, APRIL 21, 2025

REPORTED BY: NATALIE PARVIZI-AZAD, CSR, RPR, RSR
CSR NO. 14125
JOB NO.: 318430

1 Q. Do you recall anything that you relied 11:33:50
2 upon in reaching that conclusion? 11:33:52
3 A. No. 11:33:54
4 Q. You don't recall when you reached that 11:33:57
5 conclusion? 11:34:01
6 A. I do not. 11:34:01
7 Q. Okay. What were all of the reasons that 11:34:04
8 you relied upon in order to terminate Dean Stock's 11:34:13
9 deanship? 11:34:21
10 A. I believe they were -- I didn't think she 11:34:21
11 did a good job managing the budget of her college. 11:34:29
12 She was not successful at getting her college to buy 11:34:34
13 into the cost cutting that needed to happen. I 11:34:38
14 didn't think her vision for the college fit with the 11:34:47
15 mission or vision of the University. I didn't think 11:34:51
16 she communicated well. And I thought she had lost 11:34:53
17 support of her colleagues both within the University 11:34:56
18 and within the college and in some of the community. 11:35:00
19 Q. Anything else? 11:35:14
20 A. I don't recall anything else. 11:35:15
21 Q. Let's break those down a little bit. The 11:35:23
22 first reason that you offered was that you didn't 11:35:26
23 think she did a good job managing the budget of her 11:35:28
24 college. 11:35:32
25 A. That's correct. 11:35:32

1 we had. 11:50:10

2 Q. Fair enough. Somewhere between zero and 11:50:10

3 five? 11:50:13

4 A. I don't recall the number of conversations 11:50:13

5 we had. 11:50:19

6 Q. Well, you, I believe, felt that there were 11:50:19

7 not more than five; is that accurate? 11:50:22

8 A. That's correct. 11:50:23

9 Q. Okay. So in all likelihood, as best as 11:50:27

10 you can estimate for me today, somewhere between one 11:50:29

11 and five? 11:50:31

12 A. Yes. 11:50:32

13 Q. Now, what were the substance of those 11:50:32

14 conversations? 11:50:39

15 A. She communicated to me that there were, I 11:50:39

16 believe, two candidates; one an internal candidate, 11:50:49

17 one an external candidate. She believed that the 11:50:53

18 external candidate, who was the subsequent appointee 11:50:58

19 was the better quantified candidate for the 11:51:02

20 position. 11:51:04

21 She communicated that there was support 11:51:06

22 for the internal candidate and that the external 11:51:09

23 candidate would have a harder time, she believed, 11:51:16

24 getting the support of the community. 11:51:21

25 Q. How did she communicate this to you? 11:51:24

1	A. Verbally.	11:51:29
2	Q. What was your response?	11:51:30
3	A. I said I don't tell deans who to hire. I	11:51:33
4	will happily -- I will support her -- her decision;	11:51:39
5	that we should consider all circumstances, choose	11:51:43
6	the person, and then try to help them be as	11:51:49
7	successful as we can be.	11:51:51
8	Q. What other conversations did you have	11:51:51
9	regarding the farm director hiring project?	11:51:59
10	A. So she had made her choice. I said,	11:52:01
11	"Okay. We'll go ahead and make the appointment and	11:52:08
12	then talk about how we transition Ricardo" -- who	11:52:14
13	was the appointment -- "how we transition Ricardo in	11:52:17
14	and help him be successful at leading the college --	11:52:20
15	or the farm."	11:52:23
16	Q. Anything else?	11:52:29
17	A. I said -- as I said earlier, I said part	11:52:30
18	of that transition, she should try to leverage Dave	11:52:35
19	Daley's influence and go and ask his advice on how	11:52:40
20	to best onboard him into the community.	11:52:43
21	Q. Now other than -- we talked about doing a	11:52:50
22	good job managing the budget of her college, but I	11:52:50
23	believe your testimony that -- was that the issue	11:53:34
24	with respect to managing the budget of her college	11:53:35
25	was this conversation in which she told you that she	11:53:38

EXHIBIT B



Office of Vice Chancellor
CSU Office of the Chancellor
401 Golden Shore, Long Beach, CA 90802

www.calstate.edu

Leora D. Freedman
Vice Chancellor for Human Resources

Phone (562) 951-4500
lfreedman@calstate.edu

August 9, 2023

Via E-Mail (spstock@csuchico.edu)

Dr. S. Patricia Stock
California State University Chico
College of Agriculture
400 West First Street
Chico, CA 95929-0310

Dear Dr. Stock,

I write in response to your request for reconsideration dated July 28, 2023, of Interim Provost Perez's decision to remove you from the position of Dean of the College of Agriculture in accordance with the CSU Management Personnel Plan. The reconsideration process is governed by section 42728 of the California Code of Regulations, California State University Executive Order 1106, and California State University Chico Reconsideration Procedures for Management Personnel Plan (MPP) Employees. We met via Zoom on August 8, 2023, so that you could present your appeal of this decision.

I have reviewed the written materials you submitted and have considered the points you made during our Zoom meeting. I acknowledge your desire to be reinstated into your position as Dean, College of Agriculture. After careful consideration, I do not find that it is appropriate to overturn the decision.

In your appeal letter, you state that you and your counsel have concluded that your non-retention was unlawful based on "retaliation, whistleblower, harassment, discrimination, and tortious interference criteria, singly or in combination." While such allegations are outside the reconsideration process, other university processes govern such complaints. The relevant policies are accessible here: Complaint Procedure for Allegations of Retaliation for Having Made a Protected Disclosure under the California Whistleblower Protection Act (<https://calstate.policystat.com/policy/6742050/latest>) and CSU Policy Prohibiting

CSU Campuses
Bakersfield
Channel Islands
Chico
Dominguez Hills
East Bay

Fresno
Fullerton
Humboldt
Long Beach
Los Angeles
Maritime Academy

Monterey Bay
Northridge
Pomona
Sacramento
San Bernardino
San Diego

San Francisco
San José
San Luis Obispo
San Marcos
Sonoma
Stanislaus

STOCK001330



Dr. S. Patricia Stock

August 9, 2023

Page 2

Discrimination, Harassment, Sexual Misconduct, Sexual Exploitation, Dating Violence, Domestic Violence, Stalking, and Retaliation (Nondiscrimination Policy)

(<https://calstate.policystat.com/policy/12891658/latest/>). You have a right to file a complaint under these policies regardless of the outcome of your request for reconsideration.

During our meeting yesterday, you expressed an interest in pursuing other administrative (Management Personnel Plan) positions focused on student success or other mission-driven initiatives, although you acknowledged that you are not aware, at this time, of any such open positions. Nevertheless, I shared your interest with President Perez, and he suggested that you meet with him or with Interim Provost Lau to discuss your ideas. I encourage you to do so.

The reconsideration process is now concluded.

Sincerely,

Leora D. Freedman

Vice Chancellor for Human Resources

cc: Sheryl Woodward, AVP, Human Resources

STOCK001331

EXHIBIT C

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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

-----)
Susana Patricia Stock, an)
individual;)
Plaintiff,) No. 2:24-cv-01043-
vs.) DJC-DMC
Board of Trustees of the State)
University, a State agency;)
Stephen Perez, an individual;)
and Does 1-10, inclusive,)
Defendants.)
-----)

Videotaped Remote Deposition of DYLAN SAAKE,
at Los Angeles, California, commencing at
10:00 A.M., Tuesday, August 5, 2025, before
Judith Schlussel, CSR No. 4307.

1 A. I joined the CSU in, I believe, December of
2 2012.

3 Q. About 23 years? Sorry, 13 years. Excuse
4 me.

5 A. Yeah. I worked at Chico State for just 10:10:18
6 over 10 years and then been here for a year and a
7 little bit.

8 Q. When did you become a member of the bar?

9 A. 2005.

10 Q. Between 2005 and 2012, where did you work? 10:10:35

11 A. I worked for an organization called
12 California Rural Legal Assistance. We provided
13 advocacy on low income and Farm worker communities.

14 Q. Was that for the entire period before you
15 joined CSU? 10:10:54

16 A. It was.

17 Q. So it's fair to say that you've had about
18 20 years of experience in civil rights,
19 discrimination and harassment?

20 A. Yeah. Differing levels. But, yes. 10:11:06

21 Q. Okay. And prior to joining the Office of
22 the General Counsel, what position did you hold for
23 CSU?

24 A. I held kind of two roles at Chico State. I
25 was the director of Staff Labor Relations and I also 10:11:24

1 served as the associate -- assistant vice-president
2 of Equal Opportunity and Dispute Resolution. And in
3 that role, I functioned as the Title IX coordinator
4 and what we call the DHR administrator, being
5 discrimination, harassment, retaliation
6 administrator.

10:11:44

7 Q. Did you hold those simultaneously or --

8 A. I did.

9 Q. Did you hold those from the entire period
10 of time of 2012 until 2024?

10:11:56

11 A. No. I was initially hired in only the
12 Labor Relations role. And over my time, I got
13 increased responsibility and eventually was anointed
14 the Title IX coordinator.

15 Q. Now, when you say Title IX coordinator,
16 what do you mean by that?

10:12:15

17 A. Kind of responsible for the school's
18 implementation of Title IX laws and the DHR
19 administrator would be the kind of other protected
20 statuses equivalent; Title IX focusing on sex-based
21 discrimination and harassment.

10:12:29

22 Q. And so when you were the Title IX
23 coordinator and DHR admin, was that under the
24 umbrella of the associate vice-president of Equal
25 Opportunity and Dispute Resolution?

10:12:51

1 policy I was referring to.

2 Q. So Exhibit 50 is an iteration of Chico's
3 anti-discrimination policy?

4 A. Yes. The entire CSU system uses one
5 policy, but, yes.

10:25:11

6 Q. This policy was applicable at Chico State
7 and it looks like if you look at the top of Page 1,
8 it was applicable from January 1st, 2023 through
9 January 21st, 2025. Is that fair?

10 A. No. Well, in May of 2024, new federal
11 regulations required us to update the policy and we
12 had a version in August of 2024 that supplanted this
13 version.

10:25:26

14 Q. But so this version in Exhibit 50 was the
15 anti-discrimination policy applicable at Chico State
16 from January 1st, 2023 through August 2024?

10:25:46

17 A. I believe that is correct.

18 Q. You can put that one away. We may need to
19 refer to it later but that's all for now. I just
20 wanted to make sure we were on the same page.

10:26:03

21 So how would a complaint be made to EODR?

22 A. Well, many different ways. Sometimes
23 employees reached out to us directly. Sometimes,
24 you know, a faculty member referred. I would say
25 the most common example of how a report comes in is

10:26:23

1 some -- not to -- the most common report would be a
2 student reported to one of their faculty members I
3 experienced this harm over the weekend and I missed
4 class, the faculty member would then reach out to us
5 and say this student disclosed to me that they 10:26:48
6 experienced a policy violation. We would then reach
7 out to that student and say here are some resources,
8 we'd love to meet, are you interested in learning
9 more?

10 We have online reporting forum and people 10:27:02
11 would call or email our office directly, but any of
12 those mechanisms could be the basis of a report.

13 Q. And did the person making the report or the
14 complaint have to use any magic words to alert you
15 that they were complaining of discrimination? 10:27:24

16 A. No.

17 MR. NORTON: Hold on. Vague, ambiguous,
18 argue. Go ahead.

19 THE WITNESS: No.

20 Q. BY MS. OBANDO: So what might be in a 10:27:32
21 complaint that would alert you that it was a
22 complaint of discrimination or harassment?

23 MR. NORTON: Objection; calls for
24 speculation. Lacks foundation. Go ahead, Dylan.

25 THE WITNESS: I mean a whole spectrum of 10:27:42

1 information.

2 Q. Is there an obligation on EODR to follow up
3 with employees after you provide them with the
4 information on the antidiscrimination policy and how
5 to file the complaint? Do you have an obligation to 01:26:36
6 follow up with these employees again?

7 A. No. You know, in the circumstance where
8 we -- and again, I don't even think it's an
9 obligation. But in the circumstance where somebody
10 reports to their professor, professor reports to us, 01:26:48
11 we reach out to the person and they do not respond
12 at all, there is no conversation, we do follow-up
13 outreach saying, hey, do you got any questions, any
14 of these things, did you get our email?

15 But when we've had a conversation, we do 01:27:02
16 not do additional follow-up. We give them the
17 options to consider what they want to do and move
18 forward.

19 Q. All right. Do you have any reason to
20 believe that Dr. Stock followed up with EODR after 01:27:14
21 July 28 when she was -- after being provided this
22 information by Leora Freedman?

23 A. I do not have reason to believe that she
24 did.

25 Q. Are you aware of any facts that would cause 01:27:26

1 you to have reason to believe that Dr. Stock was for
2 whatever reason unable to make a complaint with EODR
3 for any reason at all?

4 A. No.

5 MR. NORTON: All right. I have nothing 01:27:40
6 further. I don't know if Andrea might have
7 follow-up questions.

8 MS. OBANDO: Yeah. Give me just a moment.

9
10 FURTHER EXAMINATION

11 BY MS. OBANDO:

12 Q. I believe you just testified that the
13 reconsideration was sent to the chancellor's office,
14 right?

15 A. Correct. 01:28:06

16 Q. And that Leora Freedman may have provided
17 Dr. Stock with some information about how to make a
18 complaint of discrimination, correct?

19 A. That is my understanding.

20 Q. Does that, in your mind, absolve Chico 01:28:20
21 State of any liability or any responsibility to
22 investigate a complaint of discrimination, providing
23 information to the potential complainant?

24 MR. NORTON: Objection; vague. Lacks
25 foundation. Calls for speculation. Go ahead. 01:28:35

EXHIBIT D

From: [Robert King](#)
To: [David Norton](#); [Andrea Obando](#)
Cc: [Julian Burns King](#); [Josue Avila](#); [Abraham Orozco](#); [Jack Walsh](#); [Willow Reid](#)
Subject: RE: Stock v. Board of Trustees
Date: Tuesday, June 16, 2026 10:08:31 PM
Attachments: [image001.png](#)

External email

Hi David,

I have responded below in red.

1. The production of the Police Report from PEREZ 915 does not include the referenced picture of the slur that was found on Dr. Stock's office. Please confirm that you will produce the attached picture.
- 2.

Best,

Robert King
Partner, King & Siegel LLP

From: David Norton <dnorton@porterscott.com>
Sent: Friday, June 12, 2026 12:17 PM
To: Robert King <robert@kingsiegel.com>; Andrea Obando <andrea@kingsiegel.com>
Cc: Julian Burns King <julian@kingsiegel.com>; Josue Avila <josue@kingsiegel.com>; Abraham Orozco <abraham@kingsiegel.com>; Jack Walsh <jwalsh@porterscott.com>; Willow Reid <wreid@porterscott.com>
Subject: RE: Stock v. Board of Trustees

Counsel –

Please see my responses below.



David R. Norton
Attorney | Shareholder
2180 Harvard Street | Suite 500 | Sacramento, CA 95815
T | 916.929.1481 x528 F | 916.927.3706
www.porterscott.com

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From: Robert King <robert@kingsiegel.com>
Sent: Thursday, June 4, 2026 9:06 PM
To: David Norton <dnorton@porterscott.com>; Andrea Obando <andrea@kingsiegel.com>
Cc: Julian Burns King <julian@kingsiegel.com>; Josue Avila <josue@kingsiegel.com>; Abraham Orozco <abraham@kingsiegel.com>; Jack Walsh <jwalsh@porterscott.com>; Willow Reid <wreid@porterscott.com>
Subject: RE: Stock v. Board of Trustees

External email

Hi David,

I am consolidating the outstanding discovery issues in this email. Please let me know when you're available for a call, as we will likely need motion practice to resolve some of these disputes.

Documents

1. **Talking Points.** Boura testified that his office prepared talking points for Perez for the May 26 meeting with the Farm Bureau. Those are responsive to RFPs 26 and 57, and we ask that you please produce the document referenced by Mr. Boura. We have now requested this several times without an update. Please produce this by June 12.

We conducted a search for this document and did not locate anything. There is nothing to produce.

Thank you for the update.

2. **Donations from Anderson, the California Olive Ranch, and Golden State Credit Union.** To the extent Mr. Andersen, the California Olive Ranch, or Golden State Credit Union made donations to another college or department at Chico State, that would be responsive to RFP 57. Please provide documents reflecting any donations made by these groups to any Chico State department or college. We have now requested this several times without an update. Please produce this by June 12.

Pursuant to our prior agreement to narrow RFP 57's scope to donations made from 2016 to present, please see attached documents Bates labeled DEF 049451-049459 which are produced confidentially pursuant to the stipulated protective order.

Thank you for the update.

3. **Police Report from PEREZ 915.** Please let us know when this will be provided no later than June 12.

Please see attached document Bates labeled PEREZ 1182-1186 which is produced confidentially pursuant to the stipulated protective order

The production of the Police Report from PEREZ 915 does not include the referenced picture of the slur that was found on Dr. Stock's office. Please confirm that you will produce the attached picture.

4. **Perez's communications regarding May Farm Bureau meeting.** Can you please advise as to the status of these no later than June 12.

You'll have to help me understand what you're referring to here. What specific RFP is this in reference to? I didn't see anything about this topic in any of Andrea's earlier meet and confer emails. You stated in your May 25 email when you cancelled Steve Perez's deposition that you are "missing Mr. Perez's communications with the communications team regarding the May Farm Bureau meeting." I believe we've produced all responsive emails from Steve Perez regarding this topic. If there is some specific email that you believe is missing that has come up in this case at some point, please let me know so I can track down what you're looking for that has not already been provided.

We are looking for any emails or other communications from Perez or his office regarding setting up the meeting at the end of May with the Farb Bureau. I am not aware of any that have been produced. You have produced emails referencing the meeting, but no communications between the college and members of the Farm Bureau to set up the meeting.

5. **Perez's phone records.** Can you please let us know the status of these?

We will provide an amended response to RFP 76. Mr. Perez conducted a diligent search and reasonable inquiry to attempt to obtain these records but has thus far not been able to. In sum, he was unable to access them online because they are too old. In late April, he was told by T-Mobile that they would send records to him. What he received two weeks later consisted of billing records, not phone and text logs. He then went to the T-Mobile store in person and was there for over an hour. He was once again told they would send his records to him by mail. They sent the same billing records without phone and text logs. He then called T-Mobile again to explain the issue and was once again told they would send those specific records to him within 10 business days. That was about two weeks ago. He is still waiting for the new documents from T-Mobile. If they send the right documents to him, he will produce them. If not, there is no further action for him to take on this and you will need to subpoena T-Mobile as Mr. Perez does not have the records requested in his possession, custody, or control and has gone well out of his way to obtain them for you without success.

Thank you for the update.

RFP Set 4

1. **RFPs 91-92 (Orellana and Tresoldi)**

We provided terms and custodians as requested. The last time we went through this, CSU was using Logikcull and the limitations were based on having too many proximity terms. We tried to limit that in the ones we

proposed to avoid those issues. You say that the Exchange system being used by the university, but Exchange allows for proximity searches through its Purview eDiscovery tools and the "NEAR" Boolean operator. Please clarify why CSU lacks the capability to perform these searches.

As to the custodians, however, we believe those are appropriate. While RFPs 91 and 92 relate to communications involving Dr. Tresoldi and Dr. Orellana, CSU also agreed to produce any documents related to complaints of discrimination in the School of Agriculture, which would necessarily include any documents relating to the investigation of those complaints (RFPs 100-102). Despite this agreement, there appear to be no documents relating to any investigation into the complaints that Dr. Tresoldi and Dr. Orellana made. Accordingly the custodians that we have proposed aim to capture any documents relating to those investigations.

For Dr. Tresoldi, we seek Dr. Tresoldi, Joe Unruh, Patricia Stock, Dylan Saake, Clay Carlson, any Title IX/DHR investigators or case managers, any witnesses interviewed as part of any investigation. It is our understanding that Dr. Tresoldi may have consulted Mr. Unruh about some of her concerns, Dr. Stock submitted a complaint on her behalf, Mr. Saake testified that her complaint was assigned to him, and Mr. Carlson was the subject of one of her complaints. If there were any other investigators or case managers assigned beyond Mr. Saake, then those would be appropriate custodians, as well, but we have no way of knowing the identities of those individuals. The same is true of any witnesses interviewed. We cannot know this information because the full file has not been produced.

As to Dr. Orellana, we seek Dr. Orellana, Patricia Stock, Dylan Saake, Sheryl Woodward, Joseph Morales, Erika Romo, David Hassenzuhl, any Title IX/DHR investigators or case managers, any witnesses interviewed as part of any investigation. Dr. Orellana testified that he shared with Mr. Hassenzuhl and Dr. Morales his concerns about harassment and bias at the farm. Ms. Woodward and Ms. Romo are both listed in the complaint produced as DEF 48373. It appears that complaint was routed to Julia Lape rather than Dylan Saake, and we are agreeable to swapping Ms. Lape for Mr. Saake as a custodian. That complaint also lists eatarabini@csuchico.edu and haiello@csuchico.edu as receiving copies of it, so they are also relevant custodians. The same is true of any other case managers who worked on the investigations, or any witnesses interviewed—but again, we do not know this information.

If you believe any of these custodians are not relevant to the underlying matters, please let us know why.

We've been working with CSU IT this week on running the searches through NEAR Boolean operator. We've received some of the documents from Chico State pursuant to these searches and will review for privilege/confidentiality and send over to you ASAP. But overall I'm not against running the searches so long as CSU IT is able to do it and the search terms are sufficiently narrowed so as to not create an undue burden. We'll create a table like last time that provides the results of each search.

Please provide the table no later than Wednesday, June 24.

2. **RFP 75 (Perez's office phone records).** Defendant's amended response to RFP 75 states no responsive documents are known to exist, yet Defendant has produced phone records for other individuals. Please provide further information on the basis for Defendant's statement, including how Defendant conducted this search, as it is implausible that Mr. Perez did not have or use an office phone.

We responded to the discovery request. The response is not a typo. There are no responsive documents to produce. If you'd like to propound an interrogatory on the topic, feel free to do so. You can also ask Mr. Perez at his deposition about it.

We were not asking whether the response was a typo, we are asking why the college has no phone logs relating to Mr. Perez's work phone and what was done to search for responsive documents. You seem to be unwilling to provide this information, so we will seek it through other means.

3. **RFP 83 (Haydn Clement).** CSU's response was that there are no responsive documents. However, Dr. Stock received an email about Mr. Clement posting a photograph of a confederate flag. Any correspondence about that issue would be relevant to this request.

We responded to the discovery request and provided a compliant response. There are no documents responsive to a request for "formal or informal discipline" as it pertains to race or the confederate flag.

It seems as though you are relying on a narrow definition of the term "discipline" here. Dr. Stock was asked to speak with Mr. Clement regarding this post. Regardless, if you insist on playing semantic games we will serve

a new request.

4. **RFP 95 (Cozen investigation files).** It is our position that the Cozen investigation files go to the broader discriminatory atmosphere and systemic failures to investigate complaints of discrimination. Dr. Stock told the Chancellor's office in her appeals that she believed discrimination was the reason for her removal. There is a documented complaint on behalf of Dr. Orellana about discrimination at the Farm. The testimony in this matter confirms that CSU conducted no investigation of Dr. Stock's complaints, and the same appears to be true of Dr. Orellana's. This is a broader, system-wide problem, and regardless of the parties involved in the underlying complaints reviewed by Cozen, Cozen was investigating broader issues within the Title IX office, including issues with complaints not making it to the investigatory phase. Nor is it appropriate to limit this request to just the complaints reviewed by Cozen. The Cozen report makes clear that as part of its investigative file, Cozen also reviewed surveys, engaged with employees and students, and reviewed other documents as part of its investigation. See DEF 48395-96; 48659-60. These underlying materials are all relevant to the culture at Chico State, and to bigger problems at the level of the Chancellor's office.

As I mentioned in my May 15 email, we identified three complaints reviewed by Cozen. None of the three Chico State files reviewed by Cozen has a meaningful nexus to Plaintiff's claims. One involved a sexual harassment complaint by a custodian against another custodian in Facilities Management. The other two involved students. In one case, a student claimed sexual assault by another student. In the other case, a student complained of sexual misconduct against a lecturer in another department. None have any nexus to Plaintiff's claims in this lawsuit (race/gender/national origin discrimination and retaliation) and none involve Perez/Woodward/Boura or any other witness in this lawsuit.

It is not clear from your email, but if your contention is that you believe those three investigative files are discoverable in this lawsuit, we disagree for the reasons stated above and in my May 15 email. If you take issue with CSU's response to some other RFP related to Cozen or seek some additional documents other than the three investigative files I mentioned, please clarify so that I can respond. However, if you seek the three investigative files referenced above, CSU stands on its objections.

As I stated in my prior email, we believe that Chico's failure to adequately investigate Dr. Stock's claim is important in this litigation, so other examples that may shed light on failure to investigate are relevant. To be clear, you are welcome to redact the name of the complainant in those documents for privacy reasons. Assuming that this compromise does not address your objections it seems as though we are at an impasse on this point and we will seek relief from the court.

5. **RFPs 85-88 (Documents relating to complaints from College of Agriculture).** Defendant has produced complaints, but it has not produced any investigative files related to those complaints. The investigative files are related to the complaints and response to these requests. Please confirm Defendant will supplement.

We are currently working with CSU to gather whatever investigative files may exist in relation to the complaints. If investigative files exist, we will produce pursuant to the stipulated protective order.

Please provide the documents no later than Wednesday, June 24.

6. **RFP 100-102 (Complaints of Discrimination at Chico State).** We would like to revisit the scope of this request, given the Cozen investigation and the findings of systemic inaction at CSU, all complaints of discrimination (and the response of the college) are relevant to whether Chico was on notice of discrimination and failed to take any action to correct it, as well as whether. Moreover, the individuals in your proposal (Perez, Woodward, and Boura) leave out important players, including Dylan Saake, Julia Lape, and others from the Title IX/DHR office who had complaint- and investigation-related roles. We are willing to limit this to 2020 to the present, but otherwise believe that all complaints are relevant here. This is especially true given Plaintiff's escalation of her concerns to the Chancellor's office.

Additionally, it does not appear as though an adequate search was performed for documents relating to complaints, as there are no records relating to any investigation of the Tresoldi and Orellana complaints and only a handful of documents relating to the Cindy Daley complaint.

The parties already met and conferred on these RFPs. Defendants initially narrowed their response to complaints involving the College of Agriculture and University Farm. Plaintiff then proposed, and we agreed to evaluate, a further scope covering matters involving Perez, Boura, or Woodward as subjects, witnesses, or decisionmakers. We amended our response and produced responsive documents consistent with that agreed

limitation.

Plaintiff's new request abandons that limitation and reverts back to the original request which seeks every Title IX/DHR case since 2020 alleging race, gender, or national origin discrimination across the entire University, regardless of department, complainant, respondent, decisionmaker, alleged misconduct, adverse action, or connection to Plaintiff's claims. That is overbroad, disproportionate, and not supported by the "me too" cases Plaintiff has cited. As we've discussed previously, the fact that a complaint somewhere on campus involved race, gender, or national origin does not make the file relevant to Plaintiff's claims regarding her removal as Dean of the College of Agriculture, the denial of her merit bonus, the Farm Director issues, or the failure to prevent claim especially given the prior scope we already agreed to.

The limitation we previously agreed to is appropriate. It captures matters with a potential nexus to the alleged decisionmakers or relevant witnesses while avoiding a campuswide production of confidential third-party student, faculty, and staff complaint files with no connection to this lawsuit or any witnesses or decisionmakers involved in this suit. CSU stands on the objections and the amended production already made.

As I stated in my prior email, we believe that Chico's failure to adequately investigate Dr. Stock's claim is important in this litigation, so other examples that may shed light on failure to investigate are relevant. To be clear, you are welcome to redact the name of the complainant in those documents for privacy reasons. Assuming that this compromise does not address your objections it seems as though we are at an impasse on this point and we will seek relief from the court.

7. **RFP 103 (Chancellor communications).** You ask us to propose custodians at CSU or the Chancellor's office who were involved in implementing the Cozen Report's recommendations, but we do not know who those individuals are. A directory of employees does not provide any information as to which of those employees was involved in implementing the report. On the other hand Chico State does know which individuals are relevant to these RFPs. You should work with your client to identify the correct custodians rather than asking us to guess in the dark.

I want to clarify the scope of Plaintiff's position because your latest email appears to describe a different request than RFP No. 103 and the scope we previously discussed.

RFP No. 103 seeks all communications between the Chancellor's Office and any representative of Chico State "regarding Title IX/DHR investigations or oversight." Ms. Obando previously met and conferred on that same scope. In response, we explained that the request is overbroad and not reasonably searchable as phrased, and asked Plaintiff to identify specific custodians and search terms for communications regarding "Title IX/DHR investigations or oversight."

Your email on June 5, however, changes the scope of RFP 103. You reference individuals involved in implementing the Cozen Report recommendations. Please clarify whether Plaintiff is narrowing RFP No. 103 to communications regarding implementation of the Cozen Report recommendations, or whether Plaintiff is still seeking all communications regarding Title IX/DHR investigations or oversight. Those are materially different scopes.

If Plaintiff is asking CSU to identify every Chico State or Chancellor's Office employee who may have discussed "Title IX/DHR investigations or oversight" in some capacity, CSU stands on its objections. That request remains vague, overbroad, unduly burdensome, and not reasonably particularized. It would require CSU and the Chancellor's Office to investigate which of a large number of employees may have responsive communications on a broad institutional topic before Plaintiff has identified a workable custodian universe.

If Plaintiff is instead narrowing the request to communications specifically concerning implementation of the Cozen Report recommendations, that seems much more workable. Please confirm that narrowed scope and identify the proposed date range. We can then evaluate whether a targeted search can be conducted for custodians at the Chancellor's Office who were specifically involved in implementing the Cozen Report recommendations.

We can agree to this limitation in scope with the one expansion that it should also cover communications regarding deficiencies in Chico State's Title IX/CHR process even if those deficiencies were discussed outside the context of the Cozen report. Again we lack knowledge as to who might have been involved in those communications and are not in a position to suggest custodians. We also lack knowledge about the time-frame for implementation of the Cozen report, but would initially suggest a date range of 2020 through 2025.

8. **RFP 105 (Reports of Performance of Other Deans).** CSU's response is that there are no responsive

documents to this request. However, Mr. Boura testified that he provided the provost feedback and input on all deans. See Boura Dep. 212:12-25. That feedback and input is what this request seeks, and Mr. Boura's testimony supports that it exists.

We provided a compliant response after conducting a diligent search and reasonable inquiry. There is nothing further to respond to on this point.

Noted, we will serve an RFA on this issue.

9. **Whistleblower Complaints (RFPs 8, 50; ROGs 1, 9).** These requests broadly seek information related to Plaintiff's whistleblower complaint. Defendant objected on the basis of its ongoing investigation. However, that investigation has since concluded. Please confirm Defendant will supplement these responses.

We have the final determination letter pertaining to the whistleblower complaint. We will produce that confidentially pursuant to the stipulated protective order. See attached Bates labeled DEF 49447-49450. By producing this document, we are construing Plaintiff to have waived any confidentiality afforded to her by statute or CSU policy. As to other investigation documents, we will produce those documents early next week pursuant to the stipulated protective order.

Thank you for producing these documents. Are you confirming that you have now completed production of all documents relating to the investigation of Dr. Stock's complaint?

Thank you

Third Party Subpoenas

Please advise as to the status of the Hearsay issues with the other witnesses. Please also confirm that Mr. Daley will be producing his messages with Mr. Boura.

We provided supplemental productions of the text message subpoena for third party witnesses back in April. At this time, we have nothing further to produce in response to those subpoenas.

Just to be clear, you are stating that Dave Daley does not have any text messages with Ahmed Boura relating to Dean Stock or donors to the College of Agriculture or University Farm?

Depositions

Please provide Mr. Perez's availability for deposition. We will also need to depose Ms. Woodward in her individual capacity. Please confirm Defendant will produce her and provide her availability.

I put in a request for Mr. Perez's availability before the close of discovery and will get back to you shortly.

We do not stipulate to taking Ms. Woodward's individual deposition at this time. Plaintiff has already taken 12 depositions in this case for purposes of Rule 30, including the CSU PMK deposition which included numerous categories and also sought personal knowledge testimony from each of the witnesses who were designated as PMK for each category. Plaintiff has four more depositions on calendar in addition to trying to reschedule Steve Perez's deposition. Further, Ms. Woodward has already testified extensively as CSU's PMK, including on approximately 15 categories. During that deposition, like the other PMKs designated, you questioned her at length about her personal knowledge and involvement in the Farm Director search, the issues raised by Dr. Stock, the removal decision/process, the reconsideration process, the appeal, reporting obligations, and the June 14 meeting. Before we can evaluate whether there is any basis to stipulate to another deposition of Ms. Woodward, please identify the specific non-duplicative topics you contend remain to be examined and why those topics justify exceeding the deposition limit under Rule 30.

Thank you for the Perez dates. For Woodward, Defendant has produced numerous documents that were either sent or received by her which should have been produced earlier, including emails planning Dr. Stock's removal, Woodward was also disclosed to have been the subject of a race-based discrimination complaint and to have been involved in other complaints such as the 2024 complaint by Cindy Daley. While this is not a comprehensive list, we believe that it more than justifies a deposition of Ms. Woodward in her individual capacity.

Best,

Robert King

Partner, King & Siegel LLP

From: David Norton <dnorton@porterscott.com>

Sent: Thursday, May 28, 2026 5:44 PM

To: Andrea Obando <andrea@kingsiegel.com>

Cc: Julian Burns King <julian@kingsiegel.com>; Robert King <robert@kingsiegel.com>; Josue Avila <josue@kingsiegel.com>; Abraham Orozco <abraham@kingsiegel.com>; Jack Walsh <jwalsh@porterscott.com>; Willow Reid <wreid@porterscott.com>

Subject: RE: Stock v. Board of Trustees

Andrea,

This email is directed at RPDs 91, 92, and 103.

RPDs 91-92

As an initial issue, the proposed terms are not workable as written. We've been through this issue in this case when we attempted to complete a complex search of emails within Chico State's email files using the type of proximity syntax terms you propose. Chico State's available search process uses Microsoft Outlook/Exchange functionality, which does not support the proximity syntax or the nested wildcard/Boolean searches in the format proposed.

There is also a scope issue. RPD Nos. 91 and 92 seek communications between Tresoldi/Orellana and others. For that reason, the reasonable starting point is a search of Tresoldi's and Orellana's University mailboxes, not open-ended searches across broad categories such as "any Title IX/DHR investigators," "case managers," or "any witnesses interviewed," which are not identified custodians.

We are willing to have IT run targeted searches of the following mailboxes and date ranges:

For RPD No. 91: Grazyne Tresoldi's University mailbox, January 1, 2020 through the end of her employment, using the following terms/phrases: "normal student," "normal students," "snapchat," "snap chat," complaint, complaints, complained, complaining, discrimination, discriminatory, discriminated, harassment, harassed, race, racist, racism, "national origin," Brazil, Brazilian, accent, sexist, sexism, bias, biased, unfair, demean, demeaned, and demeaning.

For RPD No. 92: Ricardo Orellana's University mailbox, January 1, 2023 through the end of his employment, using the following terms/phrases: student complaint, student complaints, complaint, complaints, complained, complaining, discrimination, discriminatory, discriminated, harassment, harassed, race, racist, racism, "national origin," accent, culture, cultural, background, gender, sexist, sexism, bias, biased, unfair, and "unfair treatment."

Any documents located would still need to be reviewed for responsiveness, privilege, privacy, and confidentiality before production.

If Plaintiff contends additional custodians are necessary, please identify the specific custodians by name and explain why their mailboxes should be searched for communications responsive to these particular requests.

RPD 103

Same issue as above with respect to the search terms. The proposed search terms are not workable as written because the available search process does not support the /25 or /15 proximity syntax or wildcard terms such as investigat!, finding!, implement!, or appeal!.

There also remains a custodian issue. Chico State can search identified mailboxes. It cannot search "the Chancellor's Office" or "any representative of Chico State" as abstract categories. Publicly available CSU materials identify Chancellor's Office departments, roles, and personnel, including systemwide HR and civil rights personnel. Plaintiff should identify the specific custodians/mailboxes it contends are relevant so we can evaluate whether the requested search is reasonable and proportional.

If Plaintiff wants us to evaluate a targeted search, please identify the specific mailboxes to be searched, a reasonable date range, and appropriate search terms.

David R. Norton

Attorney | Shareholder

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From: Andrea Obando <andrea@kingsiegel.com>

Sent: Wednesday, May 20, 2026 2:06 PM

To: David Norton <dnorton@porterscott.com>

Cc: Julian Burns King <julian@kingsiegel.com>; Robert King <robert@kingsiegel.com>; Josue Avila <josue@kingsiegel.com>; Abraham Orozco <abraham@kingsiegel.com>; Jack Walsh <jwalsh@porterscott.com>; Willow Reid <wreid@porterscott.com>

Subject: RE: Stock v. Board of Trustees

External email

Hi David,

In terms of the outstanding issues, I have the below. Could you please let us know Defendant's position and/or provide a timeline for production of any remaining documents?

Documents

1. **Talking Points.** Boura testified that his office prepared talking points for Perez for the May 26 meeting with the Farm Bureau. Those are responsive to RFPs 26 and 57, and we ask that you please produce the document referenced by Mr. Boura.
2. **Donations from Andersen, the California Olive Ranch, and Golden State Credit Union.** To the extent Mr. Andersen, the California Olive Ranch, or Golden State Credit Union made donations to another college or department at Chico State, that would be responsive to RFP 57. Please provide documents reflecting any donations made by these groups to any Chico State department or college.

RFP Set 4

1. **RFPs 84 (Darby Heffner).** We received an amended response that no records exist for Haydn Clement, but we have not received an update or response as to Darby Heffner.
2. **RFPs 91-92 (Tresoldi and Orellana complaint communications).** We propose the below search terms. Without knowing the individuals involved, we cannot identify the custodians. We propose the below as a starting point, but given our limited information, we reserve the right to supplement it down the line if needed.

RFP 91 (Tresoldi)

- Custodians: Tresoldi, Joe Unruh, Patricia Stock, Dylan Saake, Clay Carlson, any Title IX/DHR investigators or case managers, any witnesses interviewed as part of any investigation
- Terms:
 - Normal /15 student*
 - (Grazyne OR Tresoldi) /15 (complain* OR demean* OR "national origin" OR Brazil OR outsider OR racis* OR race OR sexis* OR discriminat* OR harass* OR accent)
 - (Grazyne OR Tresoldi) /15 (snapchat OR "snap chat")
 - (Grazyne OR Tresoldi) /15 (bias /5 (review* OR eval*))

RFP 92 (Orellana)

- Custodians: Orellana, Patricia Stock, Dylan Saake, Sheryl Woodward, Joseph Morales, Erika Romo, David Hassenzahl, any Title IX/DHR investigators or case managers, any witnesses interviewed as part of any investigation
- Terms:
 - (Ricardo OR Orellana OR "Farm Director") /15 (complain*)
 - (Ricardo OR Orellana OR "Farm Director") /15 ("national origin" OR racis* OR sexis* OR discriminat* OR harass* OR accent OR culture OR race OR background)

3. **RFP 100-102 (DHR/Title IX complaints).** We are fine with your proposal for now, but reserve the right to revisit it if needed.
4. **RFP 103 (Chancellor communications).** We are happy to provide search terms for this, but are not in a position to provide custodians, given our limited knowledge of the relevant personnel. Can you please provide some information about the roles/titles involved? That might help us narrow this further. In the meantime, we propose the below terms for now, subject to revisiting if necessary.
 - Terms:
 - Cozen /25 (investigat! OR finding! OR implement! OR oversight OR oversee OR monitor OR recommend!)
 - ("Title IX" OR DHR) /15 (investigat! OR oversight OR oversee OR appeal!)

Depositions

Can you please advise as to your availability in June and July for Ms. Tresoldi's deposition, as well as Ms. Cecil's?

Text Messages

Please advise as to the Hearsay issues, as well as the status of Mr. Perez's messages, as well as any messages between Mr. Daley and Mr. Boura in Mr. Daley's possession.

Thanks,

Andrea Obando

Managing Associate, King & Siegel LLP

Phone 213-465-4802 Direct 213-282-8810

Web www.kingsiegel.com Email andrea@kingsiegel.com

601 University Avenue, Ste. 275, Sacramento, CA 95825

From: David Norton <dnorton@porterscott.com>

Sent: Friday, May 15, 2026 3:48 PM

To: Andrea Obando <andrea@kingsiegel.com>

Cc: Robert King <robert@kingsiegel.com>; Julian Burns King <julian@kingsiegel.com>; Abraham Orozco <abraham@kingsiegel.com>; Josue Avila <josue@kingsiegel.com>; Jack Walsh <jwalsh@porterscott.com>; Willow Reid <wreid@porterscott.com>

Subject: RE: Stock v. Board of Trustees

Hi Andrea –

This email is specifically directed at your meet and confer efforts related to RFP Nos. 95 and 100-102. I also want to address the personal telephone logs for Steve Perez.

Perez Personal Cell Phone Logs

RFP No. 10 to Steve Perez sought his personal cell phone records between March 1 and July 31, 2023. As we stated in the response, Perez had to request those cell phone logs from his cell phone provider. He did so several weeks ago. In response to that request, T-Mobile sent him billing records but did not include phone and text logs. Perez then went to the T-Mobile store in person to request the logs and they said they would correct the issue and mail him the logs within 10 business days. That was on May 12. Given the timing, I cannot guarantee they will be produced to you by the date of his deposition on May 26, although its very possible they will be. I will provide them to you as soon as I receive them but I wanted to provide you with an update on the production.

RFP 95 (Cozen investigation files)

This request seeks "all investigation files reviewed by Cozen O'Connor's Institutional Response Group as part of their evaluation of California State University, Chico in 2022 or 2023." We narrowed the response to investigation files pertaining to the College of Agriculture and the University Farm. There were no responsive documents. The Chico State report confirms that Cozen reviewed only a small sample of case files. In fact, we identified three. None of the three Chico State files reviewed by Cozen has a meaningful nexus to Plaintiff's

claims. One involved a sexual harassment complaint by a custodian against another custodian in Facilities Management. The other two involved students. In one case, a student claimed sexual assault by another student. In the other case, a student complained of sexual misconduct against a lecturer in another department. None have any nexus to Plaintiff's claims in this lawsuit (race/gender/national origin discrimination and retaliation) and none involve Perez/Woodward/Boura or any other witness in this lawsuit.

Diaz does not support production of these unrelated confidential files. *Diaz* involved discovery directed to the employer's hiring and promotion practices in an age discrimination case, where the requested information concerned the type of employment decisions at issue. *Diaz v. Am. Tel. & Tel.*, 752 F.2d 1356, 1364 (9th Cir. 1985). It does not hold that a plaintiff challenging an employment decision is entitled to unrelated Title IX/DHR investigative files involving different departments, different complainants, different respondents and different alleged conduct. The Supreme Court has emphasized that "me too" evidence requires a fact-specific nexus to the plaintiff's circumstances and theory. *Sprint/United Mgmt. Co. v. Mendelsohn*, 552 U.S. 379, 388 (2008). There is no such nexus here.

Nor does Plaintiff's failure to prevent claim justify production of these files. Rule 26 requires relevance and proportionality. These complete investigative files contain sensitive third-party personnel and student information and would impose substantial privacy and confidentiality burdens without corresponding probative value.

We intend to stand on this objection. Nevertheless, if you have any additional evidentiary showing or legal authority which you think makes these unrelated complaints discoverable, please let me know and I'd be happy to review it.

RFP Nos. 100-102

These RFPs request "All Title IX/DHR cases alleging [race/gender/national origin] discrimination or unequal treatment based on [race/gender/national origin]." We asserted several objections to the request, including that the request was vague, ambiguous, and overbroad as to time and scope and that the request seeks confidential third-party records not relevant to the lawsuit. We narrowed the response to the 2020-present time frame and complaints pertaining to the College of Ag and University Farm. There were no responsive documents for that self-narrowed response.

In your meet and confer correspondence, you seek to expand the scope to "any investigation files that pertain to departments or units over which [Perez, Boura, and Woodward] had any decision-making or authority."

We disagree with your proposed scope. First, a request for "all Title IX/DHR cases" alleging race/gender/national origin discrimination or unequal treatment at Chico State is vague, overbroad, and disproportionate. The phrase "cases" does not identify with reasonable particularity the documents sought and could be read to demand entire investigative files (which is how you refer to it in your email), including intake materials, witness statements, interview notes, correspondence, evidence packets, findings, discipline, privileged communications, and attorney work product. Rule 34 requires requests to describe documents with reasonable particularity, and Rule 26 limits discovery to matters relevant to a claim or defense and proportional to the needs of the case.

Plaintiff's proposed alternative scope is also not a meaningful limitation. Perez, Boura, and Woodward held institutional roles. Defining the relevant universe as every department or unit over which they had any "authority" is tantamount to requesting all complaints of discrimination across the entire campus regardless of its nexus to Plaintiff's claims. Woodward's status as HR Director does not make every DHR/Title IX matter relevant. *Clark* and *Heyne* do not support wholesale production of unrelated campuswide files. They recognize that other discrimination evidence may be relevant where it tends to show discriminatory intent. They do not hold that a plaintiff is entitled to every discrimination file across an institution. As stated above, "me too" evidence requires a fact-specific nexus to the plaintiff's circumstances and theory. *Sprint/United Mgmt. Co.*, 552 U.S. at 388.

The nexus analysis also depends on the complainant, respondent, unit, alleged misconduct, and adverse action. This is an employment case brought by a former Dean challenging an adverse employment action. So, for example, student complaints against faculty in unrelated departments involve different relationships, decision-making structures and remedial frameworks. They are simply not relevant to this lawsuit. That said, we are willing to produce nonprivileged complaint/intake documents from 2020-present for complaints involving Perez/Woodward/Boura to the extent they were either the subjects of the complaints or they

personally participated in the investigation either as witnesses or decisionmakers. Additional file materials related to complaints, if any, should be addressed only after Plaintiff identifies a specific complaint with a sufficient factual nexus. Please let me know if that is acceptable and we'll amend the response and produce additional documents, if necessary.



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From: David Norton

Sent: Thursday, May 7, 2026 12:32 PM

To: 'Andrea Obando' <andrea@kingsiegel.com>

Cc: Robert King <robert@kingsiegel.com>; Julian Burns King <julian@kingsiegel.com>; Abraham Orozco <abraham@kingsiegel.com>; Josue Avila <josue@kingsiegel.com>; Jack Walsh <jwalsh@porterscott.com>; Willow Reid <wreid@porterscott.com>

Subject: RE: Stock v. Board of Trustees

Hi Andrea –

Wanted to provide an update on this. None of the issues involving Perez should be a problem in advance of his deposition. We're working on a supplemental document production now that should be over to you early next week. That is in addition to responding to the document requests he'll be responding to on Monday. A couple non-Perez RPDs I want to respond to:

- RFPs 91-92 (Tresoldi and Orellana complaint communications). I'm not opposed to providing a response to these requests, nor am I opposed to the time frame suggested below. However, these are former employees who don't have access to their email accounts. As a result, I cannot ask them to go through their University email to find responsive documents. My request would be that you propose some specific search terms for these requests.
- RFP 103 (Chancellor communications). This request asks for all communications between the Chancellor's Office and any rep of Chico State regarding Title IX/DHR investigation or oversight. The problem with this request is that the "Chancellor's Office" employs several hundreds of people. I cannot run an email search of the "Chancellor's Office." Please propose some specific custodians and search terms.
- Your email asks about producing the litigation hold email. Please see the attached documents Bates labeled DEF 049285-049287.



David R. Norton

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From: Andrea Obando <andrea@kingsiegel.com>

Sent: Monday, May 4, 2026 1:19 PM

To: David Norton <dnorton@porterscott.com>

Cc: Robert King <robert@kingsiegel.com>; Julian Burns King <julian@kingsiegel.com>; Abraham Orozco <abraham@kingsiegel.com>; Josue Avila <josue@kingsiegel.com>; Jack Walsh <jwalsh@porterscott.com>; Willow Reid <wreid@porterscott.com>

Subject: RE: Stock v. Board of Trustees

External email

Hi David,

Following up on the below. We'd like to resolve the issues that involve Mr. Perez before his deposition.

We'd also like to amend the limitations we proposed for RFP 75-76 to also include Ashley Gebb and any of Mr. Perez's assistants.

Thanks,

Andrea Obando

Managing Associate, King & Siegel LLP

Phone 213-465-4802 Direct 213-282-8810

Web www.kingsiegel.com Email andrea@kingsiegel.com

601 University Avenue, Ste. 275, Sacramento, CA 95825

From: David Norton <dnorton@porterscott.com>

Sent: Wednesday, April 29, 2026 11:35 AM

To: Andrea Obando <andrea@kingsiegel.com>

Cc: Robert King <robert@kingsiegel.com>; Julian Burns King <julian@kingsiegel.com>; Abraham Orozco <abraham@kingsiegel.com>; Josue Avila <josue@kingsiegel.com>; Jack Walsh <jwalsh@porterscott.com>; Willow Reid <wreid@porterscott.com>

Subject: RE: Stock v. Board of Trustees

Hi Andrea – yes, Dr. Orellana's deposition will be videotaped. The May dates do not work for me, but the June dates are fine with the exception of June 15.



David R. Norton

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From: Andrea Obando <andrea@kingsiegel.com>

Sent: Wednesday, April 29, 2026 11:14 AM

To: David Norton <dnorton@porterscott.com>

Cc: Robert King <robert@kingsiegel.com>; Julian Burns King <julian@kingsiegel.com>; Abraham Orozco <abraham@kingsiegel.com>; Josue Avila <josue@kingsiegel.com>; Jack Walsh <jwalsh@porterscott.com>; Willow Reid <wreid@porterscott.com>

Subject: RE: Stock v. Board of Trustees

External email

Thanks, David. Could you please let me know which of these dates you would be available for those depositions: May 18-22, May 25, 27, 28, June 15-19, June 22-25?

For Dr. Orellana's deposition, will it be video recorded?

Thanks,

Andrea Obando

Managing Associate, King & Siegel LLP

Phone 213-465-4802 Direct 213-282-8810

Web www.kingsiegel.com Email andrea@kingsiegel.com

601 University Avenue, Ste. 275, Sacramento, CA 95825

From: David Norton <dnorton@porterscott.com>
Sent: Monday, April 27, 2026 8:19 AM
To: Andrea Obando <andrea@kingsiegel.com>
Cc: Robert King <robert@kingsiegel.com>; Julian Burns King <julian@kingsiegel.com>; Abraham Orozco <abraham@kingsiegel.com>; Josue Avila <josue@kingsiegel.com>; Jack Walsh <jwalsh@porterscott.com>; Willow Reid <wreid@porterscott.com>
Subject: RE: Stock v. Board of Trustees

Hi Andrea – I'm preparing a response to the entirety of this email but in the meantime wanted to respond about the depositions specifically. We will not object to the taking of those depositions. We will not represent or accept service for the listed deponents.



David R. Norton
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From: Andrea Obando <andrea@kingsiegel.com>
Sent: Monday, April 20, 2026 5:47 PM
To: David Norton <dnorton@porterscott.com>
Cc: Robert King <robert@kingsiegel.com>; Julian Burns King <julian@kingsiegel.com>; Abraham Orozco <abraham@kingsiegel.com>; Josue Avila <josue@kingsiegel.com>; Jack Walsh <jwalsh@porterscott.com>; Willow Reid <wreid@porterscott.com>
Subject: RE: Stock v. Board of Trustees

External email

Hi David,

In addition to Robert's follow up below as to the text message issues, we'd like to confer on the following. For ease of reference and the sake of completeness, I am also including the text messages issue below.

Documents

1. **Talking Points.** Boura testified that his office prepared talking points for Perez for the May 26 meeting with the Farm Bureau. Those are responsive to RFPs 26 and 57, and we ask that you please produce the document referenced by Mr. Boura.
2. **Donations from Andersen, the California Olive Ranch, and Golden State Credit Union.** To the extent Mr. Andersen, the California Olive Ranch, or Golden State Credit Union made donations to another college or department at Chico State, that would be responsive to RFP 57. Please provide documents reflecting any donations made by these groups to any Chico State department or college.
3. **Litigation Hold email.** Can you please produce the email transmitting the litigation hold in this matter? We believe that is responsive to RFP 37.

RFP Set 4

1. **RFPs 75-76 (Perez's phone records).** Several witnesses have testified to having conversations with Mr. Perez about Plaintiff, and discovery to date supports that Mr. Perez was communicating with donors about Dean Stock and her removal. His phone logs from that period are therefore relevant and responsive. We propose narrowing this request to calls from/to any of the following: Dave Daley, Ahmad Boura, Dustin Bush, Sheryl Woodward, Gayle Hutchinson, Patrick Andersen, Jim Lipman, Colleen Cecil, and any member of the Farm staff, Farm Bureau, or Superior Ag.
2. **RFPs 78-79, 81 (Bush and Boura's phone records).** We propose the same limitations as above, with the addition of Mr. Perez.
3. **RFPs 83-84 (Haydn Clement and Darby Heffner).** These request seek any discipline imposed on these

individuals. As Mr. Clement and Ms. Heffner made discriminatory comments about Latino individuals (foreigner and f*cking foreigner), any discipline imposed on them goes to the discriminatory atmosphere at the College of Agriculture, as well as CSU's response to the same. For now, we are willing to narrow this request to discipline related to any complaints of discrimination, harassment, and/or any complaints related to the use of a confederate flag. Please let us know if that works, or if you have an alternative scope to suggest.

4. **RFPs 91-92 (Tresoldi and Orellana complaint communications).** This request asks for communications regarding Ms. Tresoldi and Dr. Orellana's complaints of discrimination. As both submitted complaints of discrimination, any communications about those complaints are relevant to a discriminatory atmosphere and whether CSU was on notice of, or took appropriate action to correct, discrimination within the College of Agriculture. We are willing to narrow this request to 2020 through the end of Ms. Tresoldi and Dr. Orellana's respective employments. Please let us know if that works, or if you have an alternative scope to suggest.
5. **RFP 95 (Cozen investigation files); RFP 100 (Title IX/DHR cases involving race); RFP 101 (gender discrimination); RFP 102 (national origin).** Defendant narrowed its response to these requests to the College of Agriculture and University Farm from 2020 to the present. However, important witnesses and decision-makers in this case, including Perez, Boura, and Woodward held institutional positions. The appropriate scope of this request is therefore any investigation files that pertain to departments or units over which they had any decision-making or authority. Such a scope is warranted by Plaintiff's failure to prevent claim, and such evidence is directly relevant to Plaintiff's burden of establishing discriminatory intent. *See Clark v. Claremont University Center*, 6 Cal. App. 4th 639, 667-668 (1992) (evidence of a discriminatory mind-set that is revealed by the employer's discriminatory treatment of others is admissible to demonstrate that the plaintiff was discriminated against); *Heyne v. Caruso*, 69 F.3d 1475, 1480 (9th Cir. 1995) (evidence of sexual harassment complaints by other female employees is admissible to establish defendant's discriminatory intent).

Evidence of other complaints or investigations considered by Cozen goes to whether Defendant had notice of a discriminatory work environment but did not take adequate measures to ensure that the discrimination was remedied. Indeed, the Ninth Circuit has even allowed for broad discovery of me-too evidence that included the entire western portion of the United States. *See Diaz v. American Telephone & Telegraph*, 752 F.2d 1356, 1364 (9th Cir. 1985) ("It is irrelevant whether the same Operations Manager made all of the hiring and promotion decisions about which Diaz seeks information. One way of reaching conclusions about an employer's motive is by ascertaining whether the employer's explicit or implicit policies encourage or permit discriminatory employment decisions by its supervisory personnel.")

Defendant did not unilaterally narrow other similar requests concerning Cozen (see RFP 96). Please confirm that Defendant will supplement, or otherwise let us know if you have an alternative proposal.

6. **RFP 99 (Vacancy Records).** This request is seeking documents showing any vacancies in the Title IX/DHF office. This could include any job postings, position requisitions, or other reporting. Please advise what about this request Defendant wishes to confer on.
7. **RFP 103 (Chancellor communications).** This request seeks communications between the Chancellor's office and Chico regarding Title IX/DHR oversight. This is relevant to Plaintiff's failure to prevent claims, as such communications might reveal, for example, that there were ongoing issues with discrimination at the institutional level that CSU Chico failed to correct. Such a failure would be highly probative of the discrimination Plaintiff alleges. We are willing to narrow this request to 2020 to present. Please advise if you have an alternative approach.
8. **RFPs 77, 80, 82.** For these requests, Defendant limited its response to certain individuals. We request that Gayle Hutchinson be included and the responses supplemented.

Depositions

We intend to depose Patrick Andersen, Denise Crosswhite, Dennis Choate, Colleen Cecil, and Grazyne Tresoldi. Please advise whether you object to any of these depositions, and/or if you will represent any of these individuals or are authorized to accept subpoenas for them (excepting Ms. Cecil, who we understand has separate counsel).

Text Messages

Please advise as to the Hearsay issues, as well as whether you will produce Mr. Perez's messages in advance of his deposition and collect any messages between Mr. Daley and Mr. Boura from Mr. Daley.

Service List

Could you please ensure your service list includes myself, Julian Burns King, Robert King, Josue Avila, and Abraham Orozco? I believe a few of us were left off the last service.

Thanks,

Andrea Obando

Managing Associate, King & Siegel LLP

Phone 213-465-4802 **Direct** 213-282-8810

Web www.kingsiegel.com **Email** andrea@kingsiegel.com

601 University Avenue, Ste. 275, Sacramento, CA 95825

EXHIBIT E

P O R T E R | S C O T T

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Attorney for Defendants BOARD OF TRUSTEES OF THE CALIFORNIA STATE UNIVERSITY
(*erroneously sued as* BOARD OF TRUSTEES OF THE STATE UNIVERSITY) and STEPHEN PEREZ

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SUSANA PATRICIA STOCK, an individual,

Case No.: 2:24-cv-01043-DJC-DMC

Plaintiff,

v.

**DEFENDANT BOARD OF TRUSTEES
OF THE CALIFORNIA STATE
UNIVERSITY'S SECOND AMENDED
RESPONSE TO PLAINTIFF'S REQUEST
FOR PRODUCTION OF DOCUMENTS,
SET FOUR**

BOARD OF TRUSTEES OF THE STATE
UNIVERSITY, a State agency, STEPHEN
PEREZ, an individual; and DOES 1-10,
inclusive,

Defendants.

Complaint Filed: 04/08/2024

FAC Filed: 05/09/2024

PROPOUNDING PARTY: Plaintiff, SUSANA PATRICIA STOCK

RESPONDING PARTY: Defendant, BOARD OF TRUSTEES OF THE CALIFORNIA STATE
UNIVERSITY

SET NO: FOUR

Defendant BOARD OF TRUSTEES OF THE CALIFORNIA STATE UNIVERSITY ("Responding
Party") hereby responds to Plaintiff SUSANA PATRICIA STOCK's Request for Production of Documents,
Set Four, pursuant to Federal Rule of Civil Procedure 34.

///

PRELIMINARY STATEMENT

In responding to this Request for Production of Documents, you have been furnished with such information as is presently available. This may include hearsay and other forms of evidence which are neither reliable nor admissible in evidence. Responding Party reserves the right to supplement the responses contained herein as new or additional information is discovered or becomes available.

Responding Party has not completed its investigation of all facts of this case, or discovery in this matter, and has not completed its preparation for trial. Accordingly, the following responses are provided without prejudice to Responding Party's right to introduce at trial any evidence that is subsequently discovered relating to proof of presently known facts and to produce and introduce all evidence whenever discovered relating to the proof of subsequently discovered material facts. Moreover, facts, documents, and things now known may be imperfectly understood and accordingly, such facts documents, and things may not be included in the following responses.

Responding Party reserves the right to refer to, conduct discovery with reference to, or offer into evidence at the time of trial any and all facts, documents, and things which it does not presently recall but may recall at some time in the future, notwithstanding the initial responses provided herein. Responding Party further reserves the right to raise all appropriate objections with reference to the admissibility of any response of document at the time of trial, even though it may not be specifically objected to in these responses during discovery.

Responding Party objects to Plaintiff's requests insofar as they seek information that is protected from disclosure by the attorney-client privilege, the work product doctrine, and any other applicable privilege. To the extent that Responding Party inadvertently discloses information that is protected under any applicable privilege, such inadvertent disclosure does not constitute a waiver of such privilege.

Responding Party further objects to Plaintiff's requests insofar as they seek documents concerning matters unrelated to the subject matter of the lawsuit on the grounds that such requests are overbroad, unduly burdensome, and seek information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

These general objections are applicable to each and every one of the following responses and objections, and failure to repeat an objection in response to a specific request shall not be deemed waiver of

1 the objection in response to a specific request, such specific response cannot be a waiver of these general
2 objections. Further, when Responding Party specifically repeats one or more of these general objections in
3 response to a specific request, such specific response cannot be a waiver of these general objections.

4 Responding Party responds as follows to Plaintiff's Request for Production of Documents, Set Four,
5 in accordance with Responding Party understanding of the fair meaning of those requests.

6 **SECOND AMENDED RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS, SET**

7 **FOUR**

8 **REQUEST NO. 100:**

9 All Title IX/DHR cases alleging race discrimination or unequal treatment based on race at California
10 State University, Chico from 2017 to the present.

11 **RESPONSE TO REQUEST NO. 100:**

12 Responding Party responds to Request for Production ("RPD") No. 100, erroneously numbered as
13 RPD No. 101 as follows:

14 Responding Party objects on the grounds that the request seeks documents already produced in this
15 lawsuit. The request is vague, ambiguous, and overbroad as to time and scope. The request seeks confidential
16 third party records not relevant to this lawsuit. Responding Party further objects on the grounds that the
17 request is overbroad, unduly burdensome, not proportional to the needs of the case, and not reasonably
18 tailored to seek information relevant to any claim or defense. The request is not drawn with narrow specificity
19 and is not the least intrusive means of seeking whatever information Plaintiff contends is relevant. The
20 request seeks documents protected by the attorney-client privilege and work product doctrine. Subject to and
21 without waiving said objections, Responding Party responds as follows:

22 Responding Party will conduct a diligent search and reasonable inquiry as it pertains to such cases
23 from 2020-present that pertain to the College of Agriculture and University Farm. After conducting a diligent
24 search and reasonable inquiry, Responding Party is unable to comply with this request because no responsive
25 documents exist.

26 **AMENDED RESPONSE TO REQUEST NO. 100**

27 Responding Party responds to Request for Production ("RPD") No. 100, erroneously numbered as
28 RPD No. 101 as follows:

1 Responding Party objects on the grounds that the request seeks documents already produced in this
2 lawsuit. The request is vague, ambiguous, and overbroad as to time and scope. The request seeks confidential
3 third party records not relevant to this lawsuit. Responding Party further objects on the grounds that the
4 request is overbroad, unduly burdensome, not proportional to the needs of the case, and not reasonably
5 tailored to seek information relevant to any claim or defense. The request is not drawn with narrow specificity
6 and is not the least intrusive means of seeking whatever information Plaintiff contends is relevant. The
7 request seeks documents protected by the attorney-client privilege and work product doctrine. Subject to and
8 without waiving said objections, Responding Party responds as follows:

9 Pursuant to meet-and-confer efforts between the parties, Responding Party will conduct a diligent
10 search and reasonable inquiry to produce nonprivileged complaint/intake documents from 2020-present for
11 complaints involving Steve Perez, Sheryl Woodward, and/or Ahmad Boura to the extent those individuals
12 were either the subject of complaint or they personally participated in the investigation either as witnesses or
13 decisionmakers. Please see DEF 049445-049446 which are confidential documents produced pursuant to the
14 stipulated protective order.

15 **REQUEST NO. 101:**

16 All Title IX/DHR cases alleging gender discrimination or unequal treatment based on gender at
17 California State University, Chico from 2017 to the present.

18 **RESPONSE TO REQUEST NO. 101:**

19 Responding Party responds to Request for Production (“RPD”) No. 101, erroneously numbered as
20 RPD No. 102 as follows:

21 Responding Party objects on the grounds that the request seeks documents already produced in this
22 lawsuit. The request is vague, ambiguous, and overbroad as to time and scope. The request seeks confidential
23 third party records not relevant to this lawsuit. Responding Party further objects on the grounds that the
24 request is overbroad, unduly burdensome, not proportional to the needs of the case, and not reasonably
25 tailored to seek information relevant to any claim or defense. The request is not drawn with narrow specificity
26 and is not the least intrusive means of seeking whatever information Plaintiff contends is relevant. The
27 request seeks documents protected by the attorney-client privilege and work product doctrine.

28 Responding Party will conduct a diligent search and reasonable inquiry as it pertains to such cases

1 from 2020-present that pertain to the College of Agriculture and University Farm. After conducting a diligent
2 search and reasonable inquiry, Responding Party is unable to comply with this request because no responsive
3 documents exist.

4 **AMENDED RESPONSE TO REQUEST NO. 101**

5 Responding Party responds to Request for Production (“RPD”) No. 101, erroneously numbered as
6 RPD No. 102 as follows:

7 Responding Party objects on the grounds that the request seeks documents already produced in this
8 lawsuit. The request is vague, ambiguous, and overbroad as to time and scope. The request seeks confidential
9 third party records not relevant to this lawsuit. Responding Party further objects on the grounds that the
10 request is overbroad, unduly burdensome, not proportional to the needs of the case, and not reasonably
11 tailored to seek information relevant to any claim or defense. The request is not drawn with narrow specificity
12 and is not the least intrusive means of seeking whatever information Plaintiff contends is relevant. The
13 request seeks documents protected by the attorney-client privilege and work product doctrine. Subject to and
14 without waiving said objections, Responding Party responds as follows:

15 Pursuant to meet-and-confer efforts between the parties, Responding Party will conduct a diligent
16 search and reasonable inquiry to produce nonprivileged complaint/intake documents from 2020-present for
17 complaints involving Steve Perez, Sheryl Woodward, and/or Ahmad Boura to the extent those individuals
18 were either the subject of complaint or they personally participated in the investigation either as witnesses or
19 decisionmakers. After a diligent search and reasonable inquiry, Responding Party is unable to comply with
20 the request because no responsive documents exist.

21 **REQUEST NO. 102:**

22 All Title IX/DHR cases alleging gender discrimination or unequal treatment based on national origin
23 or accent at California State University, Chico from 2017 to the present.

24 **RESPONSE TO REQUEST NO. 102:**

25 Responding Party responds to Request for Production (“RPD”) No. 102, erroneously numbered as
26 RPD No. 103 as follows:

27 Responding Party objects on the grounds that the request seeks documents already produced in this
28 lawsuit. The request is vague, ambiguous, and overbroad as to time and scope. The request seeks confidential

1 third party records not relevant to this lawsuit. Responding Party further objects on the grounds that the
2 request is overbroad, unduly burdensome, not proportional to the needs of the case, and not reasonably
3 tailored to seek information relevant to any claim or defense. The request is not drawn with narrow specificity
4 and is not the least intrusive means of seeking whatever information Plaintiff contends is relevant. The
5 request seeks documents protected by the attorney-client privilege and work product doctrine.

6 Responding Party will conduct a diligent search and reasonable inquiry as it pertains to such cases
7 from 2020-present that pertain to the College of Agriculture and University Farm. After conducting a diligent
8 search and reasonable inquiry, Responding Party is unable to comply with this request because no responsive
9 documents exist.

10 **AMENDED RESPONSE TO REQUEST NO. 102**

11 Responding Party responds to Request for Production (“RPD”) No. 102, erroneously numbered as
12 RPD No. 103 as follows:

13 Responding Party objects on the grounds that the request seeks documents already produced in this
14 lawsuit. The request is vague, ambiguous, and overbroad as to time and scope. The request seeks confidential
15 third party records not relevant to this lawsuit. Responding Party further objects on the grounds that the
16 request is overbroad, unduly burdensome, not proportional to the needs of the case, and not reasonably
17 tailored to seek information relevant to any claim or defense. The request is not drawn with narrow specificity
18 and is not the least intrusive means of seeking whatever information Plaintiff contends is relevant. The
19 request seeks documents protected by the attorney-client privilege and work product doctrine. Subject to and
20 without waiving said objections, Responding Party responds as follows:

21 Pursuant to meet-and-confer efforts between the parties, Responding Party will conduct a diligent
22 search and reasonable inquiry to produce nonprivileged complaint/intake documents from 2020-present for
23 complaints involving Steve Perez, Sheryl Woodward, and/or Ahmad Boura to the extent those individuals
24 were either the subject of complaint or they personally participated in the investigation either as witnesses or
25 decisionmakers. After a diligent search and reasonable inquiry, Responding Party is unable to comply with
26 the request because no responsive documents exist.

1 Date: June 1, 2026

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3
4 By /s/ David R. Norton

David R. Norton

Attorney for Defendants BOARD OF TRUSTEES
OF THE CALIFORNIA STATE UNIVERSITY and
STEPHEN PEREZ

CASE NAME: *Susana Patricia Stock v. Board of Trustees of the State University, et al.*
CASE NO.: 2:24-cv-01043-DJC-DMC

PROOF OF SERVICE

I am a resident of the United States and of the County, of Sacramento, California. I am over the age of eighteen years and not a party to the within above-entitled action. My business address is 2180 Harvard Street, Suite 500, Sacramento, CA 95815.

I am familiar with this Company's practice whereby the mail, after being placed in a designated area, is given the appropriate postage, and is deposited in a U.S. mailbox in the City of Sacramento, California, after the close of the day's business.

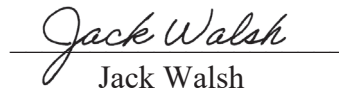
That on the date below, I served the following: **DEFENDANT BOARD OF TRUSTEES OF THE CALIFORNIA STATE UNIVERSITY'S SECOND AMENDED RESPONSE TO PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS, SET FOUR** on all parties in the said action as addressed below by causing a true copy thereof to be served:

	BY MAIL: I placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this business' practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. ☐ Certified Mail/Return Receipt Requested, Article #
	BY PERSONAL SERVICE: I caused such document to be personally delivered to the person(s) addressed below. (1) For a party represented by an attorney, delivery was made to the attorney or at the attorney's office by leaving the documents, in an envelope or package clearly labeled to identify the attorney being served, with a receptionist or an individual in charge of the office, between the hours of nine in the morning and five in the evening. (2) For a party, delivery was made to the party or by leaving the documents at the party's residence with some person not younger than 18 years of age between the hours of eight in the morning and six in the evening.
	BY OVERNIGHT DELIVERY: I enclosed the documents in an envelope or package provided by an overnight delivery carrier and addressed to the person(s) listed below. I placed the envelope or package for collection and overnight delivery at my office or a regularly utilized drop box of the overnight delivery carrier.
✓	BY ELECTRONIC SERVICE: I caused the documents to be sent to the persons at the electronic notification address(es) listed below during the normal course of business hours and the transmission was reported as complete without error.

Addressed as follows:

Julian Burns King, Esq.
Robert J. King, Esq.
Andrea Obando, Esq.
KING & SIEGEL LLP
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Attorneys for Plaintiff

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at Sacramento, California on June 1, 2026.


Jack Walsh