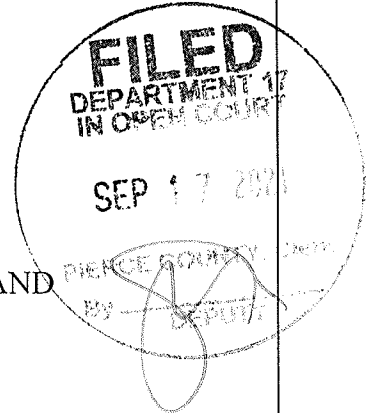


1 THE HONORABLE KARENA KIRKENDOLL
2 Motion to Compel and for Protective Order
3 Hearing date and time: Friday, September 17, at 9 a.m.



4
5
6
7 IN THE SUPERIOR COURT OF WASHINGTON IN AND
8 FOR PIERCE COUNTY

9 GILLIAN MARSHALL,

10 Plaintiff,

11 vs.

12 THE STATE OF WASHINGTON,
13 UNIVERSITY OF WASHINGTON, a State
14 Agency, DIANE YOUNG, individually, and
15 JILL PURDY, individually, and MARK
16 PAGANO, individually,

17 Defendants.

Case No.: 19-2-11120-3

18 SECOND AMENDED ~~PROPOSED~~
19 ORDER GRANTING PLAINTIFF'S
20 MOTION TO COMPEL

21 THIS MATTER, having come before the Court, and this Court having reviewed the
22 following:

- 23 1. Plaintiff's Motion to Compel and For Protective Order
24 2. Declaration of John P. Sheridan In Support Of Plaintiff's Motion to Compel
25 and For Protective Order;
3. Declaration of Gillian Marshall In Support Of Plaintiff's Motion to Compel and
For Protective Order;

SECOND AMENDED ~~PROPOSED~~
ORDER GRANTING PLAINTIFF'S
MOTION TO COMPEL - 1

SHERIDAN LAW FIRM, P.S.
Hoge Building, Suite 1200
705 Second Avenue
Seattle, WA 98104
Tel: 206-381-5949 Fax: 206-447-9206

- 1 4. Defendants' Response to Plaintiff's Motion to Compel and For Protective
2 Order;
3 5. Declaration of Casey Byrne
4 6. Plaintiff's Reply
5 7. Declaration of John P. Sheridan in Support of Reply
6 8. Declaration of Gillian Marshall in Support of Reply
7 9. Declaration of Rose Njoroge in Support of Reply
8 10. Declaration of Sarah Hampson in Support of Reply.
9 11. The records and files herein;

11 **IT IS HEREBY ORDERED that:**

12 Plaintiff's Motion to Compel is **GRANTED**. Plaintiff withdrew her motion for a
13 protective order so that issue is moot.

14 **IT IS ALSO HEREBY ORDERED THAT:**

- 15 1. Defendant shall fully answer:

- 16
- 17 • Requests for Admissions 161, 162, 163, 164, 165, 166, 167, 168, 169,
18 170, 171, 172, 173, 174, 175, 176, 177
 - 19 • RFPs 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172,
20 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186,
21 187, 188, 189, 190, 191. - *limited to emails with the name in the*
22 *subject line or body of the email.*
 - 23 • RFPs 200, 201, 202, 203, 204, 205, 206, 207, 209, 220 ^{** See below*}
 - 24 • RFPs 210, 211 - *limited to emails only.*
 - 25 • RFP 212 - *DENIED (D. Young).*

**(RFP 209) External reviews for Dr. Marshall shall be redacted to exclude
all geographical and biographical identifiers.*

SECOND AMENDED ~~PROPOSED~~
ORDER GRANTING PLAINTIFF'S
MOTION TO COMPEL - 2

SHERIDAN LAW FIRM, P.S.
Hoge Building, Suite 1200
705 Second Avenue
Seattle, WA 98104
Tel: 206-381-5949 Fax: 206-447-9206

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

- RFPs 213-219 *Denied (M. Harris; J. Aguirre; E. Casey; A. Gavin; S. Hampson; M. Montgomery; D. Miller).*
- RFP 221 - *limited to past 5 years; information to be obtained from individual units and provided to counsel.*

2. Defendants will provide responses to the discovery requests identified by plaintiff in this motion NO LATER THAN October 1, 2021.

DONE IN OPEN COURT this 17th day of September, 2021

Kirkendoll
The Honorable Karena Kirkendoll
King County Superior Court Judge

PRESENTED this 17th day of September 2021 by:
THE SHERIDAN LAW FIRM, P.S.

By: /s/ John P. Sheridan
John P. Sheridan, WSBA No. 21473
Hoge Building, Suite 1200
705 Second Avenue
Seattle, WA 98104
Phone: 206-381-5949
Fax: 206-447-9206
jack@sheridanlawfirm.com
Attorneys for Plaintiff

