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Attorneys for Defendants COUNTY OF SONOMA,  
JOSEPH RICKS, and DANIEL AGER

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

21 GWEN DANIELSON, et al.,  
22 Plaintiffs,  
23 v.  
24 COUNTY OF SONOMA, CALIFORNIA, et al.,  
25 Defendants.

Case No.: 3:21-cv-8854JCS

**JOINT CASE MANAGEMENT  
STATEMENT AND STATUS REPORT**

Date: November 18, 2022  
Time: 2:00 p.m.  
Courtroom: F

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**BLEDSON, DIESTEL, TREPPA & CRANE LLP**

BLISS  
BEEBEE, DIESEL, TREPPE & CRANE LLP

1 TO THE HONORABLE CHIEF MAGISTRATE JUDGE SPERO:

2 The following joint case management statement and status report is filed to inform this  
3 Court of any developments related to the pending related criminal matters and other relevant  
4 updates. On April 19, 2022, the Court granted Plaintiffs' request for stay of the instant civil case  
5 pending the outcome of the criminal charges pending against Plaintiffs (Doc. No. 39, p.9, ln.24-  
6 25).

7 At the previous status report August 19, 2022, Plaintiffs' counsel Jerold Friedman  
8 informed the Court and counsel that Plaintiff Gwen Danielson was missing and rumored to have  
9 committed suicide. To this date Mr. Friedman has not had any contact with Ms. Danielson and  
10 her whereabouts remain unknown.

11 Additionally, Mr. Friedman acknowledged that Plaintiff Jack Lasota is now deceased  
12 after a boating accident in the San Francisco Bay Area. Based on this information, Defendants'  
13 Westminster Woods Camp and Conference Center, Christopher Rhodes and Olivia Longstaff  
14 filed and served a "Suggestion of Death Upon the Record Pursuant to Rule 25" relating to  
15 Plaintiffs Danielson and Lasota. (Doc No. 44). Plaintiffs' filed a response to the Suggestion of  
16 Death Upon the Record. (Doc No. 45). Based on Plaintiffs' non-objection to the death of  
17 Plaintiff Jack Lasota, Defendants filed and served a "Supplemental Notice of Suggestion of  
18 Death Upon the Record Pursuant to Rule 25", noting the confirmation of Jack Lasota's death.  
19 (Doc No. 46). Plaintiffs no longer object to Defendants Rule 25 notice as it pertains to LaSota  
20 but Plaintiffs continue to object to the Rule 25 notice as it pertains to Danielson.

21 Based on Plaintiffs' counsel's lack of communication with Plaintiffs Danielson and  
22 Lasota Mr. Friedman plans to file a Motion to Withdraw as Counsel as to those two Plaintiffs.

23 Each Plaintiff's criminal charges remain pending. Their individual status is indicated  
24 below.

25 *People v. Gwen Danielson* (Case No. SCR-733198-1). On April 11, 2022, a bench  
26 warrant was issued for her nonappearance in the criminal matter. There are no further updates  
27 according to the Superior Court of California, County of Sonoma.

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1 *People v. Emma Borhanian* (Case No. SCR-733198-2). On October 31, 2022, Superior  
2 Court, County of Sonoma, Judge Honigsberg vacated the preliminary hearing, with the new  
3 hearing set for December 16, 2022.

4 *People v. Jack LaSota* (Case No. SCR-733198-4). On October 26, 2022, a bench warrant  
5 was issued for her [sic] nonappearance in the criminal matter.

6 *People v. Alexander Leatham* (Case No. SCR-733198-4). On October 26, 2022, Superior  
7 Court, County of Sonoma, Judge Honigsberg ordered a mental competency to stand trial  
8 evaluation pursuant to Cal. P.C. § 1368.

9 Plaintiffs request that the stay remain in place at this time.

10  
11 Dated: 11/10/22

By: /s/ Jerold D. Friedman  
Jerold D. Friedman  
Attorney for Plaintiffs

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14  
15 Dated: 11/10/22

By: /s/ Richard Osman  
Richard Osman  
Attorneys for Defendants  
County of Sonoma  
Deputy Joseph L. Ricks  
Deputy Daniel Ager

16  
17  
18  
19 Dated: 11/10/22

By: /s/ Nicholas D. Syren  
Richard S. Diestel  
Nicholas D. Syren  
Attorney for Defendants  
Westminster Woods Camp And  
Center; Christopher Rhodes,  
and Olivia Longstaff

BEESOE, DIESTEL, TREPPE & CRANE LLP

CERTIFICATE OF SERVICE

I, the undersigned, hereby declare as follows:

I am employed in the County of San Francisco, State of California; I am over the age of eighteen years and am not a party to this action; my business address is 180 Sansome Street, Fifth Floor, San Francisco, California 94104, in said County and State.

On November 10, 2022, I served the attached document(s):

JOINT CASE MANAGEMENT STATEMENT AND STATUS REPORT

Upon all named counsel of record as follows:

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[X] BY ECF (ELECTRONIC CASE FILING [ECF]): I e-filed/e-served the above-detailed documents via ECF pursuant to Federal Rules of Civil Procedure. A copy of this electronic transmission confirmation will be retained with the attached document.

I certify under penalty of perjury that the foregoing is true and correct. Certificate of Service was executed by the undersigned on November 10, 2022, at San Leandro, California.

[Signature]
AnnaMaria Escobar

BERTRAND FOX ELLIOT OSMAN & WENZEL LLP

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