

1 Roy S. Gordet, State Bar No. 103916
2 Law Office of Roy S. Gordet
235 Westlake Center #452
3 Daly City CA 94015
4 Tel. (650) 757-6147
5 Fax (650) 735-3380
6 Email roy@copyrightdirection.com

7 Attorney for Petitioner Irvin Muchnick

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF ALAMEDA

10
11 IRVIN MUCHNICK,

12 Petitioner,

13 vs.

14 UNIVERSITY OF CALIFORNIA, BOARD OF
15 REGENTS,

16 Respondent.

) Case No. RG17857115

) HAYWARD DIVISION

) SECOND DECLARATION OF ROY S.
) GORDET IN SUPPORT OF REPLY FOR
) PRIVACY MOTION

17
18
19
20
21 Hearing Date: August 1, 2018

22 Time: 9:00 a.m.

23 Judge: Hon. Jeffrey S. Brand

24 Dep't: 507

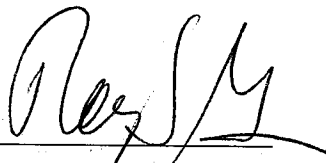
25 Petition Filed: April 18, 2017

26 I, Roy S. Gordet, under penalty of perjury, under the laws of the State of California, states as
27 follows:

28 1. I am a Member of the Bar of California and admitted to practice before all state and Federal
courts in California.

- 1 2. I am counsel of record to Petitioner Irvin Muchnick in the above-captioned lawsuit. I make these
2 statements based on my personal knowledge, unless otherwise noted.
- 3 3. I informed Mr. Goldstein by email on June 25, 2018 that I intentionally set the return date of the
4 Motion to coincide with the previously set August 1 Case Management Hearing.
- 5 4. This scheduling was done in order to consolidate and make the motion and hearing procedure
6 more efficient for all concerned, including the mere setting of the return date.
- 7 5. I also informed Mr. Goldstein on June 25, 2018 that our side would be prejudiced by a
8 continuance of the August 1 hearing date for the reason that in reliance on the Court's scheduling of
9 the Case Management Hearing date I had purchased tickets to Sydney, Australia for a combined
10 business and vacation trip from August 4 to August 26.
- 11 6. I am a sole practitioner and actually had intended to take this trip in June or July but postponed it
12 in light of the Court's setting of the Case Management Hearing in this case for August 1, 2018.
- 13 7. Respondent in open Court claimed staffing issues for seeking the extended August 1 due date for
14 its report on categorizations and further disclosures, and Petitioner assented in a spirit of
15 cooperation.
- 16 8. The parties also agreed in open Court, again with the Court's assent, that as Respondent came
17 across additional documents to disclose, Respondent would disclose same to Petitioner on a
18 "rolling basis" prior to the next scheduled Case Management Conference on August 1.
- 19 9. As of the date of filing this Reply Memorandum, Respondent has not disclosed a single
20 additional document.
- 21 10. At the last hearing, the Court acknowledged that further delay diminishes and undercuts what
22 Petitioner seeks to achieve, and this Petition should proceed at a more rapid pace.

23 Executed on July 24, 2018 in Daly City,
24 California


25
26
27
28
Roy S. Gordet