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VILLARREAL HUTNER PC

575 Market Street, Suite 1700 San Francisco, California 94105 Phone 415.543.4200 Fax 415.512.7674 www.VHAttorneys.com

Lara Villarreal Hutner, Esq.
Writer's Direct Line: (415) 632-4101
lhutner@vhattorneys.com

January 21, 2020

Hon. James R. Reilly
Department 25
Dept.25@alameda.courts.ca.gov
Superior Court of California, County of Alameda
Rene C. Davidson Courthouse
Administration Building
1221 Oak Street, 3rd floor
Oakland, CA 94612

Re: *Qiquia Young v. The Leland Stanford Junior University, et al.*
Case No. RG17877051
Request for Recusal Under CCP § 170.1(a)(6)(i)(iii)
Based on Personal Relationship and Recreational Activities With
Stanford Defendants' Lead Counsel, Michael D. Bruno of Gordon & Rees
During Pendency of Litigation

Dear Judge Reilly:

I am counsel for Plaintiff Qiquia Young. Plaintiff received notice that her lawsuit *Qiquia Young v. The Leland Stanford Junior University et al.* (Case No. RG17877051) was reassigned to the Court on **January 9, 2020** and respectfully requests the Court recuse itself pursuant to C.C.P. § 170.1(a)(6)(i)(iii).

This request is based on the following:

- (1) Michael D. Bruno has represented Gordon & Rees' institutional clients Stanford University and Stanford Health Care in defense of Plaintiff's claims **since 2016**, and this matter was filed on **September 28, 2017**, while the Court was still a partner at Gordon & Rees;
- (2) the Court's nearly 25 years of practice at Gordon & Rees with defense counsel in this matter Michael D. Bruno (including periods of time in which the Court appears to have been the Managing Partner of the Firm's San Francisco office and Mr. Bruno presumably reported to the Court as the Firm's Employment Practice Group Leader in San Francisco); and

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(3) the apparent close social relationship and friendship between the Court, Mr. Bruno, and Mr. Bruno's brother, Christopher Bruno.

These relationships have been evidenced by a series of emails Mr. Bruno inadvertently sent to my paralegal James Riley instead of to the Court. These emails confirmed a sea duck hunting trip taken together just after the filing of this lawsuit and a possible social dinner together to celebrate the Court's appointment to the bench – all while this case was pending.

Before the lawsuit was filed, in the **Summer of 2017**, Mr. Bruno inadvertently sent an email to my paralegal James Riley – apparently intended for the Court – inviting the Court to a viewing of a documentary on Justice Scalia. My paralegal advised Mr. Bruno of the error and deleted the email.

Then just over a month after the filing of this lawsuit, on **November 1, 2017**, Mr. Bruno again inadvertently sent an email to my paralegal James Riley apparently intended for the Court – who was at the time still Mr. Bruno's partner at Gordon & Rees – arranging a sea duck hunting trip on **December 21, 2017** for Mr. Bruno, his brother Christopher Bruno, the Court, and a fourth person, with Captain R.J. Waldron of Northwind Outfitters.

Additionally, on **February 27, 2018**, Mr. Bruno sent an inadvertent email to our paralegal James Riley, again, apparently intended for the Court – copying Gordon & Rees partner Fletcher Alford – congratulating the Court on the Court's appointment to the bench, with the subject line "FW: The Honorable Judge "Reg" Reilly" and stating:

"Reg,
Congratulations!!!

We need to go to dinner ASAP to celebrate!!

MDB"

(These last two emails apparently intended for the Court during the pendency of this lawsuit are attached collectively as Exhibit 1.)

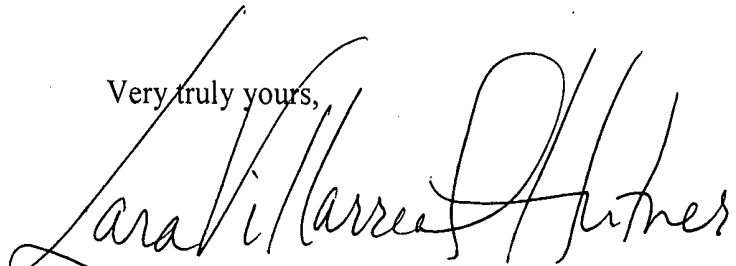
The substance and tone of the above-referenced emails from Michael D. Bruno which were intended for the Court during the pendency of this lawsuit – referencing a hunting trip with the Court, Mr. Bruno, and his brother, going to a documentary together, and a celebratory dinner with the Court – would all be just normal conduct between friends. However, when that obvious friendship is between a lead opposing counsel and the judge over a case, this close friendship would reasonably cause a person to entertain a doubt that the Court would be able to be impartial in this matter. Therefore, Plaintiff asserts that, in this instance, recusal would further the interests of justice, and on that basis respectfully requests the Court recuse itself from this matter. C.C.P. § 170.1(a)(6)(i)(iii).

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We sincerely appreciate the Court's prompt attention this matter.

Very truly yours,

A handwritten signature in black ink, reading "Lara Villarreal Hutner". The signature is written in a cursive, flowing style with a large initial "L".

Lara Villarreal Hutner, Esq.
VILLARREAL HUTNER PC

Attachments

cc: Michael Bruno, Esq.
Alyson S. Cabrera, Esq.
Pamela Y. Ng, Esq.
Tracey Kennedy, Esq.
Nora K. Stilestein, Esq.
Morgan Forsey, Esq.
Christopher Whelan, Esq.

12956880

Ex
1

Lara Villarreal Hutner

From: James Riley
Sent: Wednesday, November 01, 2017 10:01 AM
To: Michael Bruno
Subject: RE: Dec. 21 and January Puddle Ducks

No prob. Will do.

From: Michael Bruno [<mailto:mbruno@grsm.com>]
Sent: Wednesday, November 01, 2017 9:59 AM
To: James Riley
Subject: RE: Dec. 21 and January Puddle Ducks

Oopps! Wrong Riley. Meant James Reilly.

Please erase.

From: James Riley [<mailto:jriley@vhattorneys.com>]
Sent: Wednesday, November 01, 2017 9:56 AM
To: Michael Bruno
Subject: RE: Dec. 21 and January Puddle Ducks

Michael,

Just a heads up, looks like I was added here by mistake.

Thanks,

James Riley
Paralegal
Villarreal Hutner PC
575 Market Street, Suite 1700
San Francisco, CA 94105
Direct: (415) 632-4105 | Fax: (415) 512-7674
www.vhattorneys.com

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From: Michael Bruno [<mailto:mbruno@grsm.com>]
Sent: Wednesday, November 01, 2017 8:46 AM
To: 'Capt. R.J. Waldron'
Cc: James Riley; Christopher Bruno (csbruno1@yahoo.com)
Subject: Dec. 21 and January Puddle Ducks

Hi Capt. RJ,

I hope the off-season has been good to you.

Do you have a spot for four of us to shoot sea ducks on December 21?

Also, my brother and I would like back-to-back days hunting puddle ducks in January. While we would prefer weekends, we probably can make weekdays work too.

Thanks, and I look for to hearing from you.

Mike

MICHAEL D. BRUNO | Partner

GORDON & REES

SCULLY MANSUKHANI

275 Battery Street, Suite 2000

San Francisco, CA 94111

D: 415-875-3126 | P: 415-986-5900 | F: 415-986-8054

mbruno@grsm.com

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GORDON REES SCULLY MANSUKHANI LLP

<http://www.grsm.com>

Lara Villarreal Hutner

Subject: FW: The Honorable Judge "Reg" Reilly

From: Michael Bruno [<mailto:mbruno@grsm.com>]
Sent: Tuesday, February 27, 2018 5:31 PM
To: jriley
Cc: Fletcher Alford
Subject: FW: The Honorable Judge "Reg" Reilly
Importance: High

Reg,
Congratulations!!!

We need to go to dinner ASAP to celebrate!!

MDB

From: Ryan Polk
Sent: Tuesday, February 27, 2018 5:27 PM
To: Michael Bruno
Subject: FW: The Honorable Judge "Reg" Reilly

From: Nancy Barrios
Sent: Tuesday, February 27, 2018 4:50 PM
To: Micah Wayte; James Holder; Kai Peters; Melissa Fairbrother; Gene Kim; Dominic Campodonico; Christopher Terril; Ryan Polk; Thielson Da Silva; Kathy Glenn; Mary Grogan; Mary Earle; Sarah Potter; Andrew Cary; Arcelito Glorioso; Sally Gentry; Pamela Clear; Yvonne Weeks; Maria Deang
Cc: Stuart Gordon; Skip McCowan; Brian Mooney; Fletcher Alford
Subject: The Honorable Judge "Reg" Reilly

A hearty congratulations to our very own Judge Reilly!!! Couldn't be more proud.

Alabama * Arizona * California * Colorado * Connecticut * Florida * Georgia * Illinois * Kentucky * Maryland * Massachusetts * Missouri * Nebraska * Nevada * New Jersey * New York * North Carolina * Ohio * Oregon * Pennsylvania * South Carolina * South Dakota * Texas * Virginia * Washington * Washington, DC * West Virginia * Wisconsin

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