

Shannon DeNatale Boyd, State Bar No. 273574  
Jeff F. Tchakarov, State Bar No. 295506  
**PRICE, POSTEL & PARMA LLP**  
200 East Carrillo Street, Fourth Floor  
Santa Barbara, California 93101  
Telephone: (805) 962-0011  
Facsimile: (805) 965-3978  
sdb@ppplaw.com, jft@ppplaw.com

Attorneys for  
Plaintiff/Petitioner John Doe

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF MARIN**

JOHN DOE, an individual,

Plaintiff/Petitioner,

vs.

MILL VALLEY SCHOOL DISTRICT,

Defendant/Respondent.

Holly McDede,

Real Party in Interest.

Case No.: CV0003896

Assigned for all purposes to:  
Hon. Sheila S. Lichtblau, Dept. H

**PLAINTIFF/PETITIONER JOHN DOE'S  
OPPOSITION TO REAL PARTY IN  
INTEREST HOLLY MCDEDE'S  
MOTION TO PARTIALLY UNSEAL  
ORDER OF JUDGMENT AND VACATE  
ORDER GRANTING DOE ANONYMITY;  
DECLARATIONS OF JOHN DOE AND  
SHANNON D. BOYD IN SUPPORT  
THEREOF**

Hearing:

Date: August 20, 2025  
Time: 1:30 p.m.  
Place: Dept. H

Action filed: September 6, 2024

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1 Plaintiff/Petitioner John Doe (“John Doe”), by and through his undersigned counsel, submits  
2 this Opposition to Real Party in Interest Holly McDede’s (“McDede”) Motion to Partially Unseal  
3 Order of Judgment and Vacate Order Granting Doe Anonymity (“Motion”), and asserts as follows:

4 **I. INTRODUCTION**

5 McDede seeks the following relief in the Motion: (1) partially unseal the March 17, 2025  
6 Writ Order insofar as it redacts material from the Court-Ordered Disclosable Allegations only; (2)  
7 make the partially unsealed version of the Writ Order publicly available on the case docket; (3)  
8 vacate the September 19, 2024 order granting the Doe Application; and (4) unseal any sealed record  
9 or redacted material in the court records insofar as it contains John Doe’s true name or, in the  
10 alternative, direct John Doe to file a statement identifying his true name. Notice of Motion at 2:6-  
11 9; Motion at 21:1-8. John Doe does not oppose relief items (1) and (2) above, with the understanding  
12 that the Constitutionally Protected Allegations contained in the Writ Order shall remain redacted  
13 and sealed, and that McDede’s motion seeking to partially unseal relates solely to the Writ Order  
14 itself, a single document. John Doe requests that the Court allow John Doe submit the proposed  
15 redacted version of the Writ Order directly to the Judge’s clerk for review or, in the alternative,  
16 provide him with a proposed partially unsealed version of the Writ Order to ensure that all redactions  
17 related to the Constitutionally Protected Allegations remain in place both in the factual and legal  
18 analyses of the Writ Order.

19 McDede’s third and fourth requests to strip John Doe of his anonymous status should be  
20 denied in their entirety. The Court ruled that John Doe’s constitutional right to privacy is implicated  
21 such that defendant Mill Valley School District (“District”) is precluded from producing records  
22 containing Constitutionally Protected Allegations or any reference thereto. The court records in this  
23 matter contain summary and analysis of the Constitutionally Protected Allegations, with the public  
24 currently having access to such records. If John Doe were to be stripped of his John Doe status, the  
25 court record would then contain both his identity and the Constitutionally Protected Allegations.  
26 This is an absurd result that would violate John Doe’s court-determined constitutional right to  
27 privacy and defeat the entire purpose of this litigation. The public already has access to the Court’s  
28 and the parties’ legal analyses, all of which are very detailed thereby allowing the Court, the Real

1 Party in Interest, and by extension the public an opportunity to fully consider the issues and, in turn,  
2 allow access to the ultimate analysis of the Court. Disclosing John Doe’s identity will do nothing to  
3 educate the public on the legal analysis of the Court. The public’s interest is already satisfied to the  
4 extent required by law, and John Doe’s constitutionally protected right to privacy – as determined  
5 to exist by this Court – must be preserved.

6 Furthermore, McDede had numerous opportunities throughout this litigation to contest the  
7 John Doe status and chose not to, thereby waiving her right to do so. She failed to seek  
8 reconsideration of the Ex Parte application granting Doe status, and failed to appeal the Doe status  
9 following the Entry of Judgment on this matter, rendering her requested relief entirely improper.  
10 McDede cites to no case law stripping a Doe plaintiff of their status at the conclusion of a matter nor  
11 is it logical to do so here, where certain allegations were found by the Court to be Constitutionally  
12 Protected Allegations.

13 Contrary to McDede’s representations, neither the public at large nor McDede would be  
14 prejudiced if John Doe remains anonymous, whereas John Doe would suffer considerable harm if  
15 he is stripped of his John Doe status and, directly in the court records available to the public, the  
16 Constitutionally Protected Allegations are irrevocably tied to his identity. Again, this would defeat  
17 the purpose of this entire lawsuit.

18 Finally, with respect to McDede’s fourth request, it is unclear what exactly she is seeking.  
19 To the extent she is requesting that John Doe file a statement identifying his true name, the request  
20 is duplicative of her third request to revoke the John Doe status and should be denied. To the extent  
21 she is seeking an order that to unseal any sealed record or redacted material in the court records  
22 insofar as it contains John Doe’s name, McDede failed to identify any pleadings which she believes  
23 contains John Doe’s name and, in any event, there are no such pleadings and her request is moot.

## 24 **II. PROCEDURAL HISTORY**

25 On or about Friday August 23, 2024, Defendant/Respondent Mill Valley School District  
26 (“District”) provided notice to John Doe (“Notice”), its former employee, informing John Doe that  
27 the District received a request (“Request”) under the CPRA (Cal. Gov. Code. § 7920.000, *et seq.*  
28 (formerly Cal. Gov. Code § 6250, *et seq.*) implicating certain personnel documents concerning his

1 previous employment with the District. Boyd Decl. ¶¶ 2, 3. Attached to the Notice were some of  
2 John Doe’s personnel records (“Personnel Records”) containing documents relating to allegations  
3 of misconduct (“Allegations of Misconduct”). Boyd Decl. ¶ 3. The District threatened to disclose  
4 John Doe’s Personnel Records to McDede unless John Doe obtained a court order mandating  
5 otherwise by no later than Thursday August 29, 2024; the District subsequently extended this  
6 deadline to September 13, 2024. Boyd Decl. ¶ 4.

7 On Friday September 6, 2024, John Doe sought judicial relief by commencing the instant  
8 “Reverse CPRA” litigation to assert and protect his constitutional privacy rights. John Doe’s counsel  
9 immediately hired a process server to serve McDede but experienced significant difficulty locating  
10 and serving McDede. Boyd Decl. ¶ 5. John Doe’s counsel obtained McDede’s email address from  
11 the District and on Monday September 9, 2024, emailed courtesy copies of the Summons,  
12 Complaint, and related documents to McDede and asked if McDede would accept electronic service  
13 of process. Meanwhile the process server remained engaged. Boyd Decl. ¶ 6. On Tuesday September  
14 10, 2024, John Doe filed and served three Ex Parte Applications (1) to Proceed Under Fictitious  
15 Name; (2) to File Documents Under Seal; and (3) to Grant a Temporary Restraining Order and Order  
16 to Show Cause Re: Preliminary Injunction. The same day at 9:08 a.m., John Doe’s counsel emailed  
17 McDede ex parte notice and at 9:58 a.m., emailed McDede all ex parte documents including the Ex  
18 Parte Application to proceed under fictitious name. Boyd Decl. ¶ 7. At the September 11, 2024 ex  
19 parte hearing, the Court continued the Ex Parte Applications to September 18, 2024 to allow McDede  
20 to be formally served, and granted the request for temporary restraining order through that hearing  
21 date. Boyd Decl. ¶ 8. John Doe’s counsel emailed McDede the proposed order on the Ex Parte  
22 Applications on September 11, 2024 at 10:43 a.m. Boyd Decl. ¶ 9. On Thursday September 12, 2024  
23 at 11:56 a.m., John Doe’s counsel emailed McDede, again asking if she would accept electronic  
24 service as a Real Party In Interest. Boyd Decl. ¶ 10. McDede did not respond to any of these emails  
25 until the time noted below. Boyd Decl. ¶ 11.

26 On September 17, 2024, at 11:59 a.m., a process server successfully served McDede in  
27 person. Proof of Service at 2. On September 17, 2024, at 1:13 p.m., McDede finally responded to  
28 John Doe’s counsel’s email, indicating that she accepted electronic service. Boyd Decl. ¶ 12.

1 On September 19, 2024, the Court entered an order granting John Doe’s *ex parte* Application  
2 to Proceed Under Fictitious Name (“Doe Application”) and allowing John Doe to litigate  
3 anonymously “until further order of this Court.” Order on Doe Application at 2:12-15. The Court  
4 did not grant the request that the entire case be sealed but did enter orders precluding disclosure in  
5 the parties’ pleadings of Doe’s name, former employment position, school site, and all dates. The  
6 Court granted the orders to File Documents Under Seal and to Grant a Temporary Restraining Order  
7 and Order to Show Cause Re: Preliminary Injunction through the date of the Preliminary Injunction  
8 Hearing. The sole documents filed under seal by John Doe were the Personnel Records at issue in  
9 this litigation. Neither the District nor McDede have filed any documents under seal in this litigation.

10 Throughout the pleadings, John Doe described the Allegations of Misconduct while omitting  
11 dates, school site, and other personally identifiable information.

12 The Court subsequently granted the Preliminary Injunction and on January 22, 2025, John  
13 Doe filed a Motion for Judgment on Petition for Writ of Mandate (“Writ Motion”). After a hearing  
14 on the contested Writ Motion was held on February 26, 2025, the Court took the matter under  
15 submission, and on March 17, 2025, the Court entered an Order re: Motion for Judgment on Petition  
16 for Writ of Mandate (Redacted) (“Writ Order”), which granted in part and denied in part the Writ  
17 Motion. John Doe and the District received and unredacted version of the Writ Order, which is not  
18 available on the portal or to McDede.

19 The unredacted Writ Order described the Allegations of Misconduct with particularity and  
20 held that disclosure of certain categories of records containing some of the Allegations of  
21 Misconduct would violate John Doe’s constitutional right to privacy and is prohibited by law  
22 (collectively, “Constitutionally Protected Allegations”). Writ Order at 24:7-25:2. The Writ Order  
23 also held that disclosure of the remaining categories of records would not offend John Doe’s  
24 constitutional right to privacy and is permissible (collectively, “Court-Ordered Disclosable  
25 Allegations”). *Ibid.* Accordingly, the Writ Order stated that a writ of mandamus shall issue  
26 prohibiting the District from disclosing the Constitutionally Protected Allegations and required that:  
27 (1) prior to any disclosure by the District, any pages of the Personnel Records consisting solely of  
28 Constitutionally Protected Allegations must be removed; and (2) any and all references to the

1 Constitutionally Protected Allegations contained within pages also containing Court-Ordered  
2 Disclosable Allegations must be redacted prior to disclosure. *Ibid.*

3 On April 8, 2025, John Doe filed a motion to partially seal the record in this matter with  
4 respect to the Constitutionally Protected Allegations. The Court denied this motion on July 9, 2025,  
5 prior to hearing the instant Motion to revoke John Doe status.

6 On or around July 14, 2025, the District produced to McDede the Personnel Records  
7 containing all Court-Ordered Disclosable Allegations, and thus McDede is now fully aware of John  
8 Doe's identity, positions held at the District, relevant school site, and dates.

### 9 **III. LEGAL STANDARD**

10 California courts have routinely allowed plaintiffs to proceed under fictitious names when  
11 "exceptional circumstances" justify protecting plaintiffs' true identities, including: matters of a  
12 highly sensitive and personal nature (*e.g.*, prior criminal history, HIV-positive status, victim of  
13 sexual assault) (*Doe v. Sup.Ct. (Luster)*, 194 Cal. App. 4th 750, 754 (2011)); a real danger of physical  
14 or mental harm to plaintiff or others (*Dep't of Fair Emp. & Hous. v. Superior Ct. of Santa Clara*  
15 *Cnty.*, 82 Cal. App. 5th 105, 112 (2022)); and where the injury sought to be avoided by the complaint  
16 (*e.g.*, invasion of plaintiff's privacy) would be incurred by disclosure of plaintiff's identity. *Doe v.*  
17 *Lincoln Unified Sch. Dist.*, 188 Cal. App. 4th 758, 767 (2010) (holding that a tenured teacher accused  
18 of being mentally unfit to teach could proceed to sue as "Doe").

19 In *Starbucks Corp. v. Superior Court*, 168 Cal. App. 4th 1436 (2008), the Court of Appeal  
20 noted: "The judicial use of 'Doe plaintiffs' to protect legitimate privacy rights has gained wide  
21 currency, particularly given the rapidity and ubiquity of disclosures over the World Wide Web." *Id.*  
22 at 1452 n.7. The United States Supreme Court has also implicitly endorsed the use of pseudonyms  
23 to protect a plaintiff's privacy. *See, e.g., Roe v. Wade*, 410 U.S. 113 (1973); *Doe v. Bolton*, 410 U.S.  
24 179 (1973); *Poe v. Ullman*, 367 U.S. 497 (1961).

25 In *Does I thru XXIII v. Advanced Textile Corp.*, 214 F.3d 1058 (9th Cir. 2000), the Ninth  
26 Circuit Court of Appeals noted that federal courts "have permitted plaintiffs to use pseudonyms in  
27 three situations: (1) when identification creates a risk of retaliatory physical or mental harm; (2)  
28 when anonymity is necessary to preserve privacy in a matter of sensitive and highly personal nature;



1 and (3) when the anonymous party is compelled to admit [his or her] intention to engage in illegal  
2 conduct, thereby risking criminal prosecution.” *Id.* at 1067-68. The court went on to hold that “a  
3 party may preserve his or her anonymity in judicial proceedings in special circumstances when the  
4 party's need for anonymity outweighs prejudice to the opposing party and the public's interest in  
5 knowing the party's identity.” *Ibid.*<sup>1</sup>

#### 6 **IV. ARGUMENT**

##### 7 **A. MCDEDE WAIVED THE RIGHT TO CONTEST JOHN DOE STATUS AND,** 8 **BASED ON THE EXISTING ORDER, JOHN DOE STATUS SHOULD** 9 **REMAIN.**

10 McDede had numerous options throughout this litigation to contest the John Doe status and  
11 chose not to, thereby waiving her right to do so. She failed to seek reconsideration of the Ex Parte  
12 application granting Doe status in September 2024 within the time limits set forth in Code of Civil  
13 Procedure section 1008. McDede further failed to appeal the Doe status following the Entry of  
14 Judgment on this matter on April 1, 2025. These were McDede’s two opportunities to contest John  
15 Doe’s status and, having failed to do so, she is precluded from receiving the relief sought. Notably,  
16 McDede cites to no case law stripping a Doe plaintiff of their status at the conclusion of a matter nor  
17 is it logical to do so here, where certain allegations were found by the Court to be Constitutionally  
18 Protected Allegations.

19 John Doe requested – and the Court granted – anonymity “*at least until* the Court determines  
20 whether the Personnel Records are subject to disclosure under the CPRA.” Doe Application at  
21 10:14-16 (emphasis added). John Doe’s request was phrased in this fashion due to the unavoidable  
22 uncertainty regarding how the Court would ultimately rule on John Doe’s constitutional privacy

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24 <sup>1</sup> Federal courts have considered the following non-exhaustive factors in determining whether  
25 to allow a plaintiff to proceed under a fictitious name: the severity of the threatened harm, the  
26 reasonableness of plaintiff’s fears, plaintiff’s vulnerability to harm or retaliation, whether the  
27 proceedings can be structured to avoid any prejudice to defendant in allowing plaintiff to proceed  
28 anonymously, whether the public’s interest in the case would be best served by requiring that the  
litigants reveal their identities, the age of the person whose identity is sought to be protected, whether  
the action is against a private party or the government, and whether nondisclosure of plaintiff’s  
identity would prejudice the defendant. *Sealed Plaintiff v. Sealed Defendant*, 537 F.3d 185, 189–90  
(2d Cir. 2008)

1 interest in the Personnel Records; it was not phrased this way to allow McDede to later contest the  
2 *grounds* for granting John Doe status, as she does here. Had the Court decided that no such privacy  
3 interest existed or that John Doe’s privacy concerns with respect to all Allegations of Misconduct  
4 were outweighed by the public’s right to know such that there were no constitutionally protected  
5 allegations, John Doe’s fictitious name would have become redundant. On the other hand, had the  
6 Court ruled – as it ultimately did – that the Allegations of Misconduct implicated in whole or in part  
7 John Doe’s constitutional right to privacy, then John Doe status remains appropriate.

8 In the Writ Order, the Court split the Allegations of Misconduct into Court-Ordered  
9 Disclosable Allegations and Constitutionally Protected Allegations, and ruled that John Doe’s  
10 privacy interest in the Constitutionally Protected Allegations outweighs the public’s right to know.  
11 Based on the Court’s findings and conclusions in the Writ Order, John Doe should remain  
12 anonymous in this litigation in order to avoid a direct association in the court records, all of which  
13 are available to the public, between John Doe’s true identity and the Constitutionally Protected  
14 Allegations, which are described and discussed in some detail in multiple public court filings in this  
15 case.

16 **B. JOHN DOE STATUS IS WARRANTED TO PROTECT JOHN DOE’S**  
17 **CONSTITUTIONALLY PROTECTED RIGHT TO PRIVACY**

18 A Court-adjudicated, constitutionally protected right to privacy qualifies as the type of  
19 exceptional circumstance justifying protection of John Doe’s identity. Article I, Section 1 of the  
20 California Constitution states “All people are by nature free and independent and have inalienable  
21 rights. Among these are enjoying and defending life and liberty, acquiring, possessing, and  
22 protecting property, and pursuing and obtaining safety, happiness, and privacy.” Emphasis added.  
23 The Court already granted the Doe Application, finding that the constitutional right to privacy  
24 warrants John Doe status pending determination of whether the Personnel Records were indeed  
25 protected by the Constitution. Having found that some of the Personnel Records contained  
26 Constitutionally Protected Allegations and having prohibited disclosure of such records, the Court  
27 should deny the request to revoke John Doe status.

28 This seems self-evident: if a *claim* that disclosure of certain personnel records would violate

1 the constitutional right to privacy justifies Doe status (as the Court determined it did in its order on  
2 the Doe Application, to which McDede neither moved for reconsideration nor appealed), then a  
3 determination that disclosure of some of those documents would indeed violate the constitutional  
4 right to privacy must justify Doe status. While McDede contests the merits of granting John Doe  
5 status when the constitutional right to privacy is at stake, she failed to move for reconsideration and  
6 failed to appeal, thereby waiving her right to contest this issue.

7 As argued in the Doe Application and John Doe's supporting at the time and the declaration  
8 attached hereto, the stigma of having been the subject of the Constitutionally Protected Allegations  
9 will be impossible to erase from the public court records, and that was the precise reason behind the  
10 filing of this lawsuit under a fictitious name. A public connection via the court records between  
11 John Doe's real name and the Constitutionally Protected Allegations would violate John Doe's  
12 constitutional privacy rights and would cause grave and irreparable harm to John Doe in the form of  
13 embarrassment, harassment, humiliation, and harm to reputation, as well as economic and non-  
14 economic injury. Doe Application at 10:2-11; Doe Decl. ¶ 3. **Stripping John Doe status when the  
15 judicial record includes allegations that were ultimately found by this Court to be  
16 Constitutionally Protected Allegations would defeat the entire purpose of this litigation and  
17 make it impossible for potential litigants to seek relief in these Reverse CPRA matters.** This  
18 would be an absurd result, tantamount to waiver of the constitutional right to privacy which has been  
19 determined to exist.

20 There have been countless published state court decisions in California where one or more  
21 of the parties have used fictitious names because the relief sought would become impossible if the  
22 plaintiff's identity had to be exposed to obtain that relief. One analogous case is *Doe v. Lincoln*  
23 *Unified Sch. Dist.*, 188 Cal. App. 4th 758, 767 (2010), where the court held that a tenured teacher  
24 accused of being mentally unfit to teach could proceed to sue as "Doe". In *Doe v. Saenz*, 140 Cal.  
25 App. 4th 960 (2006), three convicted felons were permitted to pursue legal actions under fictitious  
26 names challenging a decision by the Department of Social Services to classify their offenses as non-  
27 exemptible, thereby precluding them from working in licensed community care facilities. In *Hooper*  
28 *v. Deukmejian*, 122 Cal. App. 3d 987 (1981), an individual convicted on a plea of maintaining a

1 place for selling or using a narcotic was permitted to sue under a fictitious name on behalf of himself  
2 and all others similarly situated to determine whether they were entitled to the benefits and  
3 protections of marijuana reform legislation. In *Jane Doe 8015 v. Superior Court*, 148 Cal. App. 4th  
4 489 (2007), a patient of a clinical laboratory sued the laboratory claiming that one of its  
5 phlebotomists had reused needles to draw blood and the plaintiff had acquired HIV as a result. In  
6 *Doe v. Bakersfield City School District*, 136 Cal. App. 4th 556 (2006), a former student who alleged  
7 sexual abuse by a former guidance counselor was permitted to pursue his action under a fictitious  
8 name.

9 Finally, analogous to one of the three situations justifying Doe status in the Ninth Circuit  
10 Court of Appeals, anonymity remains necessary to preserve John Doe’s constitutional right to  
11 privacy, which is certainly a sensitive and highly personal nature as it is protected by Article 1,  
12 Section 1 of the California Constitution. *See Does I thru XXIII v. Advanced Textile Corp.*, 214 F.3d  
13 1058, 1067-68 (9th Cir. 2000).

14 The Motion is replete with conclusory overstatements regarding the effect of the Writ Order  
15 and the District’s subsequent disclosure of the Personnel Records containing Court-Ordered  
16 Disclosable Allegations. McDede argues that “the ball game is over” and “the cat is out of the bag”  
17 merely because “[o]nce the District produces the [Court-Ordered Disclosable Allegations] to  
18 McDede, as it [already has], they will become part of the public domain ... with no justification for  
19 sealing.” Motion at 13:23-25 (internal quotations and citations omitted). Revealing the Cour-  
20 Ordered Disclosable Allegations and John Doe’s identity to McDede bears little resemblance to  
21 releasing said records into any type of “public domain” such as the public court file in this case. The  
22 Court-Ordered Disclosable Allegations alongside John Doe’s identity have not entered the public  
23 realm through any public court records, and therefore McDede’s cannot make a good faith argument  
24 that John Doe’s interest in maintaining his anonymous status in the court records is now moot. The  
25 ball game may be almost over, but not all cats are out of the bag, *i.e.*, the Court may have allowed  
26 disclosure of some of the Personnel Records, but the Court also recognized John Doe’s overriding  
27 privacy interest in the Constitutionally Protected Allegations, which requires the continued  
28 protection of John Doe’s privacy under a fictitious name in this litigation.

1 Neither the public at large nor McDede would be prejudiced if John Doe remains anonymous  
2 in the court filings. Now that the District has produced to McDede the Court-Ordered Disclosable  
3 Allegations, along with John Doe's identity, and because John Doe does not oppose a revision of  
4 the Writ Order to include material from said allegations, both McDede and the general public will  
5 be apprised of the Court's grounds for its findings of fact and conclusions of law stated in the Writ  
6 Order. Accordingly, both McDede and the public at large will have access and an opportunity to  
7 fully evaluate the Court's analysis relating to the Court-Ordered Disclosable Allegations. Through  
8 the District's production of the Court-Ordered Disclosable Allegations Personnel Records to  
9 McDede, the District's actions in investigating those allegations are now subject to a CPRA, but that  
10 is entirely different than the right of public access to Court records. If an individual seeks to review  
11 a school district's investigation, the proper method is a CPRA to the school district; it is not access  
12 to court records. Similarly, John Doe's identity is neither crucial nor relevant to the public analyzing  
13 the Court's legal analysis in this case or the right to access court records. If an individual seeks to  
14 review a school district's investigation into a specific individual or a category of allegations, as  
15 McDede did here, the proper method remains a CPRA to the school district; not a review of court  
16 records.

17 Finally, McDede fails to articulate a cognizable argument supporting her personal prejudice  
18 from John Doe's anonymous status in the public court file of this case. McDede asserts that despite  
19 the District's production of the Court-Ordered Disclosable Allegations, she is "barred from relying  
20 on facts learned therein in further briefing on this [M]otion to prove the public's compelling interest  
21 in disclosure..." Motion at 20:21-25. By the time the Court decides whether to grant the relief  
22 sought in the Motion, the briefing schedule on the Motion will have expired and thus no relief could  
23 possibly affect McDede's reply brief in this matter. McDede has failed to make a showing that  
24 ability to point to John Doe's real name would make any difference in her defense of the public's  
25 right to know.

26 Finally, with respect to McDede's fourth request, it is entirely unclear what exactly she is  
27 seeking. To the extent she is seeking that John Doe to file a statement identifying his true name, it  
28 is duplicative of her third request to revoke the John Doe status and should be denied. To the extent

1 she is seeking an order to unseal any sealed record or redacted material in the court records insofar  
2 as it contains John Doe's true name, this request is entirely too unclear and vague to respond as no  
3 specific records have been identified. John Doe has litigated this case as John Doe, with no mention  
4 of his name. Given his Doe status, his name was not included in any pleadings, thus this issue  
5 appears to be moot or an extension of her third request.

6 **V. CONCLUSION**

7 For all of the above reasons, good cause exists to maintain John Doe's anonymous status in  
8 this litigation, and John Doe respectfully requests that the Court deny the following relief sought in  
9 the Motion: (a) vacating the September 19, 2024 order granting the Doe Application; and (b)  
10 unsealing any sealed record or redacted material in the court records insofar as it contains John Doe's  
11 true name or, in the alternative, directing John Doe to file a statement identifying his true name.

12  
13 Dated: August 7, 2025

PRICE, POSTEL & PARMA LLP

14  
15 By: 

16 SHANNON D. BOYD

17 JEFF F. TCHAKAROV

18 Attorneys for

19 Plaintiff/Petitioner John Doe  
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1. I am the Plaintiff and Petitioner in the above-captioned action. I make this declaration in support of my foregoing Opposition to Real Party In Interest Holly McDede's Motion to Partially Unseal Order of Judgment and Vacate Order Granting Doe Anonymity ("Opposition"). I have personal knowledge of the facts set forth herein, and if called upon to testify thereto, I could and would competently do so under oath.

3. If my status as John Doe is revoked, the public will be able to identify me as the person targeted by the Constitutionally Protected Allegations (as the term is defined in the Motion) through access to the court's pleadings. This will result in me experiencing grave and irreparable harm in the form of embarrassment, harassment, humiliation, and harm to my reputation in the community, as well as economic and non-economic injury. As an educator, allegations of misconduct, even when untrue, are career-ending. I believe that if my John Doe status is revoked and the public is able to connect my identity with the Constitutionally Protected Allegations of Misconduct by accessing the court records, I will be ostracized and labeled a pariah. This will make it impossible to work in education, which is my life calling as well as my means of supporting myself, and could even make me a target by the community at large.

I declare under penalty of perjury under the laws of the State of California that the foregoing and correct. This declaration is executed on this 7th day of August, at Santa Rosa, California.

JOHN DOE

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1           5.       In conjunction with filing the instant lawsuit on Friday, September 6, 2024, my office  
2 immediately hired a process server to serve McDede, but we experienced significant difficulty  
3 locating and serving McDede.

4           6.       I obtained McDede's email address from the District and on Monday, September 9,  
5 2024, my office emailed courtesy copies of the Summons, Complaint, and related documents to  
6 McDede and asked if McDede would accept electronic service of process. Meanwhile the process  
7 server remained engaged.

8           7.       On Tuesday September 10, 2024, John Doe filed and served three Ex Parte  
9 Applications (1) to Proceed Under Fictitious Name; (2) to File Documents Under Seal; and (3) to  
10 Grant a Temporary Restraining Order and Order to Show Cause Re: Preliminary Injunction. The  
11 same day at 9:08 a.m., my office emailed McDede ex parte notice and at 9:58 a.m., my office  
12 emailed McDede all ex parte documents including the ex parte application to proceed under  
13 fictitious name.

14           8.       At the September 11, 2024 ex parte hearing, the Court continued the Ex Parte  
15 Applications to September 18, 2024 to allow McDede to be formally served, and granted the request  
16 for temporary restraining order through that hearing date.

17           9.       My office emailed McDede the proposed order on the Ex Parte Applications on  
18 September 11, 2024 at 10:43 a.m.

19           10.      On Thursday September 12, 2024 at 11:56 a.m., my office emailed McDede, again  
20 asking if she would accept electronic service as a Real Party In Interest.

21           11.      McDede did not respond to any of the aforementioned emails until the time noted  
22 below.

23           12.      On September 17, 2024, at 1:13 p.m., McDede finally responded to John Doe's  
24 counsel's email, indicating that she accepted electronic service.

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27           I declare under penalty of perjury under the laws of the State of California that the foregoing

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1 is true and correct. This declaration is executed on this 7th day of August 2025, at Santa Barbara,  
2 California.

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5 SHANNON D. BOYD  
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**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF SANTA BARBARA

I am employed in the County of Santa Barbara, State of California. I am over the age of eighteen (18) and not a party to the within action. My business address is 200 East Carrillo Street, Fourth Floor, Santa Barbara, California 93101.

On August 7, 2025, I served the foregoing document described as  
**PLAINTIFF/PETITIONER JOHN DOE'S OPPOSITION TO REAL PARTY IN INTEREST HOLLY MCDEDE'S MOTION TO PARTIALLY UNSEAL ORDER OF JUDGMENT AND VACATE ORDER GRANTING DOE ANONYMITY** on all interested parties in this action by the original and/or true copy thereof enclosed in sealed envelopes, addressed as follows:

Roman J. Munoz, Esq.  
Jaspreet Lochab-Dogra, Esq.  
LOZANO SMITH  
One Capitol Mall, Suite 640  
Sacramento, CA 95814  
(916) 329-7433  
[jlochab@lozanosmith.com](mailto:jlochab@lozanosmith.com)  
[rmunoz@lozanosmith.com](mailto:rmunoz@lozanosmith.com)  
[lsoares@lozanosmith.com](mailto:lsoares@lozanosmith.com)

*Attorneys for Mill Valley School District*

David Loy, Esq.  
FIRST AMENDMENT COALITION  
534 4<sup>th</sup> Street, Suite B.  
San Rafael, CA 94901  
(415) 460-5060  
[dloy@firstamendmentcoalition.org](mailto:dloy@firstamendmentcoalition.org)  
[esanchez@firstamendmentcoalition.org](mailto:esanchez@firstamendmentcoalition.org)  
[rregnier@firstamendmentcoalition.org](mailto:rregnier@firstamendmentcoalition.org)

*Attorneys for Real Party in Interest Holly McDede*

Ann Cappetta, Esq.  
Ferguson Law PC  
1816 Fifth Street  
Berkeley, CA 94710  
(510) 548-9005  
[annie@fergusonlawpc.com](mailto:annie@fergusonlawpc.com)

*Attorneys for Real Party in Interest Holly McDede*

- ☒ BY E-MAIL: I caused to be e-mailed a true copy to the e-mail addresses listed herein.
- ☒ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
- ☐ **(FEDERAL)** I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

Executed on August 7, 2025, at Santa Barbara, California.

*Aeria Bolden*

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Signature  
Aeria Bolden