

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

VALERIE KENNEDY,	:	CIVIL NO. 3:07CV0934(JCH)
PAULA ROSS	:	
	:	
<i>Plaintiffs,</i>	:	
	:	
v.	:	
	:	
STATE OF CONNECTICUT COMMISSION	:	
ON HUMAN RIGHTS & OPPORTUNITIES	:	
<i>Defendant</i>	:	June 27, 2008

JOINT STATUS REPORT

The parties hereby file the Joint Status Report due on June 27, 2008 as required by the Court in its orders on the Rule 26 (f) report.

1. NATURE OF THE CASE

Plaintiffs' claims include retaliation and discrimination on the basis of race and gender under Title VII as well as hostile work environment claims.

2. SUMMARY OF DISPUTED ISSUES OF FACT AND LAW

The parties dispute most facts alleged. At this point is it not known what issues of law are in dispute.

3. DISCOVERY:

Plaintiffs:

The plaintiffs sent written discovery to the defendant on March 3, 2008. The defendants responded to plaintiffs' written discovery on May 5, 2008. Plaintiffs' were delayed sending discovery requests in order to gather information about a related matter arising from similar facts. Plaintiff has requested to take the depositions of several state managers and said depositions are in the process of being scheduled.

Defendant: The defendant sent written discovery. Responses have been received from the plaintiffs. The case is moving slightly slower than anticipated. Several anticipated witnesses (CHRO employees) have filed separate lawsuits (one against plaintiff Valerie Kennedy) in different forums that involve overlapping facts, so sorting out facts and organizing discovery has been more challenging. The defendant took the deposition of plaintiff Paula Ross, but it had to be continued. Ms. Ross, subsequently, was hospitalized with a medical condition and when the continuation can take place is to be determined. The deposition of the plaintiff Valerie Kennedy has been noticed for July 24, 2008.

Parties: The current discovery deadline is August 15, 2008. The dispositive motion deadline is October 1, 2008. The Court on May 1, 2008 extended the deadlines to those dates and noted that “The Court does not expect there to be further extensions.” The Court on May 6, 2008 entered into a Protective Order regarding the medical records of plaintiff Ross.

Both defendants’ and plaintiffs’ counsel have full caseloads and may request the indulgence of the Court regarding the current deadlines. Counsels represent that discovery is proceeding.

4. ADDITIONAL PLEADINGS

The defendant anticipates filing a motion for summary judgment after the discovery period closes.

5. EXPECTED LENGTH OF TRIAL

A trial in this case could take between 4-6 days.

6. ADDITIONAL PREPARATIONS

No additional preparations other than what is noted above are necessary at this time.

7. COURT INTERVENTION

There is no need for Court intervention in this case at this time as counsels for the parties have enjoyed a cooperative relationship.

8. PROSPECTS FOR SETTLEMENT

The parties have not seriously discussed settlement. The parties remain willing to cooperate in future settlement discussions.

Plaintiff's counsel has suggested that a settlement conference in front of U.S. Magistrate Judge Garfinkel may be fruitful in this matter. Defense counsel has indicated a desire to review some discovery before considering such a conference.

THE PLAINTIFFS – Valerie Kennedy and Paula Ross

BY: Barbara J. Collins
Barbara J. Collins
Federal Bar No. ctct04634
44 Capitol Avenue, Suite 402
Hartford, CT 06106
Tel. No. (860) 297-6502
Fax No. (860) 246-3727
Email: barbarajcollins@barbarajcollins.com
Counsel for Plaintiff

Date: June 26, 2008

THE DEFENDANT – Connecticut Commission on Human Rights & Opportunities

BY: Joseph A. Jordano

Date: June 26, 2008

Joseph A. Jordano
Assistant Attorney General
Federal Bar No. ct21487
Office of the Attorney General
55 Elm Street - P.O. Box 120
Hartford, CT 06141-0120
Tel: 860-808-5340
Fax: 860-808-5383
Email: Joseph.Jordano@po.state.ct.us
Counsel for Defendant

CERTIFICATION

I hereby certify that on June 27, 2008 a copy of the foregoing Joint Status Report was filed electronically. Notice of this filing was sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Joseph A. Jordano

Joseph A. Jordano (# ct21487)
Assistant Attorney General
55 Elm Street, P.O. Box 120
Hartford, CT 06141-0120
Tel.: (860) 808-5340
Fax: (860) 808-5383
E-mail:
Joseph.Jordano@po.state.ct.us