

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

FRANK RICCI, ET AL,	:	
	:	NO. 3:04CV01109 (JBA)
Plaintiffs	:	
	:	
V.	:	
	:	
	:	
JOHN DESTEFANO, ET AL	:	
	:	November 13, 2009
Defendants.	:	

PLAINTIFFS' PROPOSED ORDER RE: UNDISPUTED PROMOTIONS

With respect to those plaintiffs whose entitlement to promotion is not disputed by the city, the plaintiffs propose the following order:¹

1. The City of New Haven shall forthwith promote the following plaintiffs to the rank of Captain and to each issue the badge of authority of that office: Lt. Matthew Marcarelli, Lt. Brian Joos, Lt. Timothy Scanlon, Lt. William Gambardella, Lt. Gary Carbone and Lt. Benjamin Vargas.

2. The City of New Haven shall forthwith promote the following plaintiffs to the rank of

¹ This proposed order relates only to the issue of undisputed promotions into the subject ranks of those plaintiffs the city concedes should be promoted and immediately so. It does not relate to other remedial relief that must be addressed including, but not limited to, retroactive seniority and service in rank, pension credit, and relief for lost promotional opportunities.

Lieutenant and to each issue the badge of authority of that office: Firefighter Frank Ricci, Firefighter Gregory Boivin, Firefighter Michael Christoforo, Firefighter Michael Blatchley, Firefighter Steven Durand, Firefighter Mark Vendetto, Firefighter Ryan Divito and Firefighter Christopher Parker.

BY:/s/ Karen Lee Torre

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Counsel for Plaintiffs

CERTIFICATION

I hereby certify that on November 13, 2009 a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Karen Lee Torre