

**U.S. District Court
Eastern District of New York (Brooklyn)
CIVIL DOCKET FOR CASE #: 1:20-cv-01332-RJD-SJB**

Jones et al v. Stanford et al
Assigned to: Judge Raymond J. Dearie
Referred to: Magistrate Judge Sanket J. Bulsara
Cause: 28:1331 Federal Question: Other Civil Rights

Date Filed: 03/12/2020
Jury Demand: None
Nature of Suit: 950 Constitutional -
State Statute
Jurisdiction: Federal Question

Plaintiff

Vernon Jones

represented by **Daniel Ross Lambright**
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Plaintiff

Douglas Hyson
TERMINATED: 06/02/2020

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Plaintiff

Vladimir Krull

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Plaintiff

Thomas Mitchell

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Plaintiff

Compton Mohabir

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Molly Knopp Biklen
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Plaintiff

Corydon Umber

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V.

Defendant

Tina M. Stanford

*Esq., in her official capacity as
Chairwoman of the New York Board
of Parole*

represented by

Bruce Jay Turkle

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Defendant

Anthony Annucci

*in his official capacity as Acting
Commissioner of the Department of
Corrections and Community
Supervision*

represented by

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LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Daniel Schulze

(See above for address)
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
03/12/2020	1	COMPLAINT against All Defendants \$ 400 Was the Disclosure Statement on Civil Cover Sheet completed -No,, filed by Corydon Umber, Thomas Mitchell, Vernon Jones, Vladimir Krull, Douglas Hyson, Compton Mohabir. (Attachments: # 1 Civil Cover Sheet) (Biklen, Molly) (Entered: 03/12/2020)
03/16/2020		Case assigned to Judge Raymond J. Dearie and Magistrate Judge Sanket J. Bulsara. Please download and review the Individual Practices of the assigned Judges, located on our website . Attorneys are

		responsible for providing courtesy copies to judges where their Individual Practices require such. (Barrett, C) (Entered: 03/16/2020)
03/16/2020	<u>2</u>	This attorney case opening filing has been checked for quality control. See the attachment for corrections that were made, if any. (Barrett, C) (Entered: 03/16/2020)
03/16/2020	<u>3</u>	In accordance with Rule 73 of the Federal Rules of Civil Procedure and Local Rule 73.1, the parties are notified that <i>if</i> all parties consent a United States magistrate judge of this court is available to conduct all proceedings in this civil action including a (jury or nonjury) trial and to order the entry of a final judgment. Attached to the Notice is a blank copy of the consent form that should be filled out, signed and filed electronically only if all parties wish to consent. The form may also be accessed at the following link: http://www.uscourts.gov/uscourts/FormsAndFees/Forms/AO085.pdf . You may withhold your consent without adverse substantive consequences. Do NOT return or file the consent unless all parties have signed the consent. (Barrett, C) (Entered: 03/16/2020)
03/18/2020	<u>4</u>	Proposed Summons. Re <u>1</u> Complaint, by Douglas Hyson, Vernon Jones, Vladimir Krull, Thomas Mitchell, Compton Mohabir, Corydon Umber (Biklen, Molly) (Entered: 03/18/2020)
03/18/2020	<u>5</u>	Proposed Summons. Re <u>1</u> Complaint, by Douglas Hyson, Vernon Jones, Vladimir Krull, Thomas Mitchell, Compton Mohabir, Corydon Umber (Biklen, Molly) (Entered: 03/18/2020)
03/19/2020	<u>6</u>	SUMMONS ISSUED as to Anthony Annucci, Tina M. Stanford. (Attachments: # <u>1</u> Summons Issued) (Tavarez, Jennifer) (Entered: 03/19/2020)
04/14/2020	<u>7</u>	SUMMONS Returned Executed by Corydon Umber, Thomas Mitchell, Vernon Jones, Vladimir Krull, Douglas Hyson, Compton Mohabir. Anthony Annucci served on 3/25/2020, answer due 4/15/2020; Tina M. Stanford served on 3/25/2020, answer due 4/15/2020. (Biklen, Molly) (Entered: 04/14/2020)
04/27/2020	<u>8</u>	STIPULATION <i>of Service and Time to Answer</i> by Douglas Hyson, Vernon Jones, Vladimir Krull, Thomas Mitchell, Compton Mohabir, Corydon Umber (Biklen, Molly) Modified on 4/28/2020 (<i>to add motion</i>) (Ferrara, Anthony). (Entered: 04/27/2020)
04/28/2020		ORDER: The stipulation and motion for extension of time to answer <u>8</u> is granted. Defendants shall file an answer or otherwise respond to the Complaint by 6/1/2020 . So Ordered by Magistrate

		Judge Sanket J. Bulsara on 4/28/2020. (Ferrara, Anthony) (Entered: 04/28/2020)
05/01/2020	<u>9</u>	SCHEDULING ORDER: An initial/telephone conference will be held at 11:30 AM on 6/05/2020 before Magistrate Judge Bulsara. The parties are directed to call the toll-free number 877-336-1274 . The access code is 6534420 . The parties shall dial in five (5) minutes before the 11:30 AM conference. Counsel are directed to complete the attached Discovery Plan Worksheet and electronically file same with the Court no later than two days before 6/05/2020 . Should the parties wish to adopt a plan for discovery different from the structure in the discovery worksheet, they may do so only if they file a letter explaining why such a plan is appropriate in this case. So Ordered by Magistrate Judge Sanket J. Bulsara on 5/1/2020. (Manson, Eddie) (Entered: 05/01/2020)
05/07/2020	<u>10</u>	NOTICE of Appearance by Bruce Jay Turkle on behalf of Anthony Annucci, Tina M. Stanford (aty to be noticed) (Turkle, Bruce) (Entered: 05/07/2020)
05/19/2020	<u>11</u>	Letter <i>Requesting Pre-Motion Conference for Preliminary Injunction</i> by Douglas Hyson, Vernon Jones, Vladimir Krull, Thomas Mitchell, Compton Mohabir, Corydon Umber (Biklen, Molly) (Entered: 05/19/2020)
05/19/2020	<u>12</u>	NOTICE of Appearance by Michael Cassidy on behalf of All Plaintiffs (aty to be noticed) (Cassidy, Michael) (Entered: 05/19/2020)
05/20/2020	<u>13</u>	NOTICE of Appearance by Alexis Brie Karteron on behalf of All Plaintiffs (aty to be noticed) (Karteron, Alexis) (Entered: 05/20/2020)
05/26/2020	<u>14</u>	Letter <i>in response to plaintiffs' May 19, 2020 letter requesting pre-motion conference</i> by Anthony Annucci, Tina M. Stanford (Turkle, Bruce) (Entered: 05/26/2020)
05/27/2020		ELECTRONIC SCHEDULING ORDER: re <u>14</u> Letter filed by Tina M. Stanford, Anthony Annucci, responding to request for pre motion conference. <u>11</u> Letter filed by Vladimir Krull, Vernon Jones, Douglas Hyson, Thomas Mitchell, Corydon Umber, Compton Mohabir, requesting a pre motion conference. Counsel are advised that a Telephonic Pre Motion Conference is scheduled for Tuesday June 2, 2020 at 11:00am. Dial in toll free number: 888-684-8852. Access code: 3850449. So Ordered by Judge Raymond J. Dearie on 5/27/2020. (Mulqueen, Ellen) (Entered: 05/27/2020)

05/27/2020	<u>15</u>	MOTION to Adjourn Conference <i>scheduled for June 2, 2020</i> by Anthony Annucci, Tina M. Stanford. (Turtle, Bruce) (Entered: 05/27/2020)
05/27/2020		ELECTRONIC ORDER granting <u>15</u> Motion to Adjourn Pre Motion Conference. Court has been advised that all parties are available on Wednesday June 3rd. Accordingly, the telephonic conference currently scheduled for June 2, 2020 is rescheduled to June 3, 2020 at 11:00am before the undersigned. The dial in number and access code remain as previously posted. So Ordered by Judge Raymond J. Dearie on 5/27/2020. (Mulqueen, Ellen) (Entered: 05/27/2020)
06/01/2020	<u>16</u>	NOTICE of Voluntary Dismissal by Douglas Hyson (Biklen, Molly) (Entered: 06/01/2020)
06/01/2020	<u>17</u>	AMENDED COMPLAINT <i>on consent</i> against Anthony Annucci, Tina M. Stanford, filed by Corydon Umber, Thomas Mitchell, Vernon Jones, Vladimir Krull, Compton Mohabir. (Biklen, Molly) (Entered: 06/01/2020)
06/01/2020	<u>18</u>	Letter <i>regarding voluntary dismissal of plaintiff Hyson's claims</i> by Vernon Jones, Vladimir Krull, Thomas Mitchell, Compton Mohabir, Corydon Umber (Biklen, Molly) (Entered: 06/01/2020)
06/02/2020	<u>19</u>	STIPULATION Of Dismissal: Pursuant to Federal Rule of Civil Procedure 41(a)(1)A(i), this action is hereby dismissed without prejudice as to Douglas Hyson. The Clerk of the Court is directed to terminate plaintiff Douglas Hyson. Party Douglas Hyson terminated.SO Ordered by Judge Raymond J. Dearie on 6/2/2020. (Tavarez, Jennifer) (Entered: 06/02/2020)
06/03/2020	<u>20</u>	NOTICE of Appearance by Daniel Schulze on behalf of Anthony Annucci, Tina M. Stanford (aty to be noticed) (Schulze, Daniel) (Entered: 06/03/2020)
06/03/2020		Minute Entry for telephonic pre motion conference held on 6/3/2020 before Judge Raymond J. Dearie: Following counsel on line: Molly Biklen and Alexis Karteron for plaintiffs. Bruce Turtle and Daniel Schulze for defendants. Discussion held, re: plaintiffs' request for preliminary injunction. Counsel Bruce Turkel will follow up in writing on or before 6/17/2020, as to the issues discussed. Thereafter, if motion practice moves forward, parties will agree on a briefing schedule and advise Court in writing. (Court Reporter Holly Driscoll.) (Mulqueen, Ellen) (Entered: 06/03/2020)
06/03/2020	<u>21</u>	Letter <i>enclosing joint Proposed Discovery Plan</i> by Vernon Jones, Vladimir Krull, Thomas Mitchell, Compton Mohabir, Corydon Umber

		(Attachments: # 1 Proposed Discovery Plan) (Biklen, Molly) (Entered: 06/03/2020)
06/04/2020		ORDER: The initial conference scheduled for 6/5/2020 before Magistrate Judge Sanket J. Bulsara is adjourned sine die, pending resolution of the Plaintiffs' motion for preliminary briefing. So Ordered by Magistrate Judge Sanket J. Bulsara on 6/4/2020. (Manson, Eddie) (Entered: 06/04/2020)
06/15/2020	22	<i>Defendants'</i> ANSWER to 17 Amended Complaint by Anthony Annucci, Tina M. Stanford. (Turkle, Bruce) (Entered: 06/15/2020)
06/17/2020	23	Letter <i>concerning "e-STOP" condition of parole</i> by Anthony Annucci, Tina M. Stanford (Turkle, Bruce) (Entered: 06/17/2020)
06/23/2020	24	Letter <i>regarding Defendants' e-STOP Response</i> by Vernon Jones, Vladimir Krull, Thomas Mitchell, Compton Mohabir, Corydon Umber (Biklen, Molly) (Entered: 06/23/2020)
07/03/2020	25	Letter <i>proposing briefing schedule for preliminary injunction</i> by Vernon Jones, Vladimir Krull, Thomas Mitchell, Compton Mohabir, Corydon Umber (Biklen, Molly) (Entered: 07/03/2020)
07/06/2020		ORDER re 25 Letter filed by Vladimir Krull, Vernon Jones, Thomas Mitchell, Corydon Umber, Compton Mohabir. The Court adopts the parties' proposed briefing schedule. Motion due by 7/13/2020, Response due by 8/13/2020, Reply due by 8/25/2020, Motion fully briefed 8/25/2020. So Ordered by Judge Raymond J. Dearie on 7/6/2020. (Bakst, Laura) (Entered: 07/06/2020)
07/13/2020	26	Letter <i>regarding service of motion for preliminary injunction</i> by Vernon Jones, Vladimir Krull, Thomas Mitchell, Compton Mohabir, Corydon Umber (Biklen, Molly) (Entered: 07/13/2020)
08/13/2020	27	Letter <i>to Plaintiffs' counsel enclosing Defendants' papers in opposition to motion for a preliminary injunction</i> by Anthony Annucci, Tina M. Stanford (Turkle, Bruce) (Entered: 08/13/2020)
08/25/2020	28	MOTION for Preliminary Injunction <i>of social media ban</i> by Vernon Jones, Vladimir Krull, Thomas Mitchell, Compton Mohabir, Corydon Umber. (Attachments: # 1 Memorandum in Support, # 2 Declaration of Molly K. Biklen, # 3 Declaration of Vernon Jones, # 4 Declaration of Vladimir Krull, # 5 Declaration of Thomas Mitchell, # 6 Declaration of Compton Mohabir, # 7 Declaration of Corydon Umber) (Biklen, Molly) (Entered: 08/25/2020)

08/25/2020	<u>29</u>	AFFIDAVIT/DECLARATION in Opposition re <u>28</u> MOTION for Preliminary Injunction of <i>social media ban Geh Decl. with exhibit</i> filed by Anthony Annucci, Tina M. Stanford. (Attachments: # <u>1</u> Exhibit 1 (parole conditions)) (Turtle, Bruce) (Entered: 08/25/2020)
08/25/2020	<u>30</u>	AFFIDAVIT/DECLARATION in Opposition re <u>28</u> MOTION for Preliminary Injunction of <i>social media ban DuPlessy Decl. with exhibit</i> filed by Anthony Annucci, Tina M. Stanford. (Attachments: # <u>1</u> Exhibit 1 (parole conditions)) (Turtle, Bruce) (Entered: 08/25/2020)
08/25/2020	<u>31</u>	AFFIDAVIT/DECLARATION in Opposition re <u>28</u> MOTION for Preliminary Injunction of <i>social media ban Domenech Decl. with exhibit</i> filed by Anthony Annucci, Tina M. Stanford. (Attachments: # <u>1</u> Exhibit 1 (Parole conditions)) (Turtle, Bruce) (Entered: 08/25/2020)
08/25/2020	<u>32</u>	AFFIDAVIT/DECLARATION in Opposition re <u>28</u> MOTION for Preliminary Injunction of <i>social media ban Osouna Decl. with exhibits</i> filed by Anthony Annucci, Tina M. Stanford. (Attachments: # <u>1</u> Exhibit 1 (e-STOP Condition), # <u>2</u> Exhibit 2 (notice vacating e-STOP Condition)) (Turtle, Bruce) (Entered: 08/25/2020)
08/25/2020	<u>33</u>	AFFIDAVIT/DECLARATION in Opposition re <u>28</u> MOTION for Preliminary Injunction of <i>social media ban Gomez Cox Decl. with exhibit</i> filed by Anthony Annucci, Tina M. Stanford. (Attachments: # <u>1</u> Exhibit 1 (parole conditions)) (Turtle, Bruce) (Entered: 08/25/2020)
08/25/2020	<u>34</u>	MEMORANDUM in Opposition to <i>Plaintiffs' motion for a preliminary injunction</i> filed by Anthony Annucci, Tina M. Stanford. (Turtle, Bruce) (Entered: 08/25/2020)
08/25/2020	<u>35</u>	REPLY in Support re <u>28</u> MOTION for Preliminary Injunction of <i>social media ban</i> filed by Vernon Jones, Vladimir Krull, Thomas Mitchell, Compton Mohabir, Corydon Umer. (Biklen, Molly) (Entered: 08/25/2020)
08/26/2020	<u>36</u>	Letter <i>requesting scheduling conference</i> by Vernon Jones, Vladimir Krull, Thomas Mitchell, Compton Mohabir, Corydon Umer (Attachments: # <u>1</u> Proposed Case Management Plan) (Biklen, Molly) (Entered: 08/26/2020)
08/27/2020		SCHEDULING ORDER: An initial/telephone conference will be held at 12:00 PM on 9/04/2020 before Magistrate Judge Bulsara. The parties are directed to call the toll-free number 877-336-1274 . The access code is 6534420 . The parties shall dial in five (5) minutes

		before the 12:00 PM conference. So Ordered by Magistrate Judge Sanket J. Bulsara on 8/27/2020. (Manson, Eddie) (Entered: 08/27/2020)
09/04/2020		Minute Entry And Order for proceedings held before Magistrate Judge Sanket J. Bulsara: An initial conference was held on 9/4/2020, all parties were present via telephone. The parties shall submit a joint certification that discovery has been completed by 4/26/2021 . Deadlines set based on parties' submitted joint discovery worksheet and are as follow: All fact discovery shall be completed by 1/27/2021 ; completion of all discovery by 4/26/2021 ; the last date to take the first step in dispositive motion practice shall be 5/26/2021 . A status conference will take place on 1/22/2020 at 4:00 PM before Magistrate Judge Sanket J. Bulsara. The parties are directed to call the toll-free number 877-336-1274 . The access code is 6534420 . The parties shall dial in five (5) minutes before the 4:00 PM conference. So Ordered by Magistrate Judge Sanket J. Bulsara on 9/4/2020 (AT&T Log #12:01-12:15.) (Manson, Eddie) (Entered: 09/08/2020)
09/09/2020	37	MEMORANDUM and ORDER: Plaintiffs' motion for a preliminary injunction 28 is granted. e-STOP and Directive 9201 are preliminarily enjoined as to registrants who have not used the internet to facilitate the commission of their underlying sex offense. SO Ordered by Judge Raymond J. Dearie on 9/9/2020. (Tavarez, Jennifer) (Entered: 09/09/2020)
09/17/2020	38	MOTION to Stay re 37 Order on Motion for Preliminary Injunction, by Anthony Annucci, Tina M. Stanford. (Schulze, Daniel) (Entered: 09/17/2020)
09/18/2020	39	NOTICE of Appearance by Daniel Ross Lambright on behalf of Vernon Jones, Vladimir Krull, Thomas Mitchell, Compton Mohabir, Corydon Umber (aty to be noticed) (Lambright, Daniel) (Entered: 09/18/2020)
09/21/2020	40	RESPONSE in Opposition re 38 MOTION to Stay re 37 Order on Motion for Preliminary Injunction, filed by Vernon Jones, Vladimir Krull, Thomas Mitchell, Compton Mohabir, Corydon Umber. (Biklen, Molly) (Entered: 09/21/2020)
09/22/2020		ORDER granting 38 Motion to Stay: Under the circumstances, the Court grants Defendants' modest request to stay compliance with the aspect of the Court's September 9, 2020 Order granting relief beyond the party-plaintiffs until October 9, 2020. So Ordered by Judge Raymond J. Dearie on 9/22/2020. (Baltimore, Molly) (Entered: 09/22/2020)

10/08/2020	41	MOTION for Extension of Time to File <i>proposed Plan to implement Order and to extend stay</i> by Anthony Annucci, Tina M. Stanford. (Turkle, Bruce) (Entered: 10/08/2020)
10/09/2020		ORDER granting 41 Motion for Extension of Time to File. Given counsel's representations as to the need for one more week, the application is granted. So Ordered by Judge Raymond J. Dearie on 10/9/2020. (Baltimore, Molly) (Entered: 10/09/2020)

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