

JURY

**U.S. District Court  
Northern District of Texas (San Angelo)  
CIVIL DOCKET FOR CASE #: 6:19-cv-00061-H**

Stone v Tom Green County, Texas, et al  
Assigned to: Judge James Wesley Hendrix  
Cause: 28:1331 Federal Question: Other Civil Rights

Date Filed: 10/01/2019  
Jury Demand: Plaintiff  
Nature of Suit: 440 Civil Rights: Other  
Civil Rights  
Jurisdiction: Federal Question

**Plaintiff**

**Patricia Stone**

represented by **Charles Gerstein**  
Civil Rights Corps  
1601 Connecticut Ave NW  
Suite 800  
Washington, DC 20009  
202-894-6128  
Email: [charlie@civilrightscorps.org](mailto:charlie@civilrightscorps.org)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**  
*Bar Status: Admitted/In Good Standing*

**Eric Halperin**  
Civil Rights Corps  
1601 Connecticut Ave  
Suite 800  
Washington, DC 20009  
202-844-4975  
Fax: 202-609-8030  
Email: [eric@civilrightscorps.org](mailto:eric@civilrightscorps.org)  
**PRO HAC VICE**  
**ATTORNEY TO BE NOTICED**  
*Bar Status: Not Admitted*

V.

**Defendant**

**Tom Green County, Texas**

represented by **R. Layne Rouse**  
Shafer, Davis, O'Leary & Stoker  
700 N. Grant, Suite 201  
Odessa, TX 79760  
432-332-0893  
Fax: 432-333-5002  
Email: [lrouse@shafersfirm.com](mailto:lrouse@shafersfirm.com)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**  
*Bar Status: Admitted/In Good Standing*

**Defendant**

**Allison Palmer**

represented by **R. Layne Rouse**  
(See above for address)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**  
*Bar Status: Admitted/In Good Standing*

**Defendant**

**John Best**

represented by **R. Layne Rouse**  
(See above for address)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

Bar Status: Admitted/In Good Standing

Date Filed	#	Docket Text
10/01/2019	<u>1</u>	COMPLAINT WITH JURY DEMAND against All Defendants filed by Patricia Stone. (Filer fee note– Receipt #0539–10305676 for \$400.00) Clerk to issue summons(es). In each Notice of Electronic Filing, the judge assignment is indicated, and a link to the <u>Judges Copy Requirements</u> is provided. The court reminds the filer that any required copy of this and future documents must be delivered to the judge, in the manner prescribed, within three business days of filing. Unless exempted, attorneys who are not admitted to practice in the Northern District of Texas must seek admission promptly. Forms, instructions, and exemption information may be found at <a href="http://www.txnd.uscourts.gov">www.txnd.uscourts.gov</a> , or by clicking here: <u>Attorney Information – Bar Membership</u> . If admission requirements are not satisfied within 21 days, the clerk will notify the presiding judge. (Gerstein, Charles) Modified to add receipt information on 10/3/2019 (dsr). (Entered: 10/01/2019)
10/01/2019	<u>2</u>	CERTIFICATE OF INTERESTED PERSONS/DISCLOSURE STATEMENT by Patricia Stone. (Gerstein, Charles) (Main Document 2 replaced to flatten image on 10/3/2019) (dsr). (Entered: 10/01/2019)
10/01/2019	<u>3</u>	ADDITIONAL ATTACHMENTS (Civil Cover Sheet) to <u>1</u> Complaint, by Plaintiff Patricia Stone. (Gerstein, Charles) Enhanced text and replaced document to flatten image on 10/3/2019) (dsr). (Entered: 10/01/2019)
10/03/2019	<u>4</u>	New Case Notes: A filing fee has been paid. Pursuant to Misc. Order 6, Plaintiff is provided the Notice of Right to Consent to Proceed Before A U.S. Magistrate Judge. Clerk to provide copy to plaintiff if not received electronically. (dsr) (Entered: 10/03/2019)
10/03/2019	<u>5</u>	Summons(es) Issued as to All Defendants. (dsr) (Entered: 10/03/2019)
01/03/2020	<u>6</u>	MOTION to Dismiss filed by John Best, Allison Palmer, Tom Green County, Texas with Brief/Memorandum in Support. Attorney R. Layne Rouse added to party John Best(pty:dft), Attorney R. Layne Rouse added to party Allison Palmer(pty:dft), Attorney R. Layne Rouse added to party Tom Green County, Texas(pty:dft) (Rouse, R.) (Entered: 01/03/2020)
01/03/2020	<u>7</u>	Appendix in Support filed by John Best, Allison Palmer, Tom Green County, Texas re <u>6</u> MOTION to Dismiss (Attachments: # <u>1</u> Exhibit(s)) (Rouse, R.) (Entered: 01/03/2020)
01/24/2020	<u>8</u>	RESPONSE filed by Patricia Stone re: <u>6</u> MOTION to Dismiss (Gerstein, Charles) (Entered: 01/24/2020)
01/30/2020	<u>9</u>	ORDER: The parties are ordered to obtain local counsel or file motions to proceed without local counsel by February 14, 2020. (Ordered by Judge James Wesley Hendrix on 1/30/2020) (pnp) (Entered: 01/30/2020)
01/30/2020	<u>10</u>	ORDER REQUIRING SCHEDULING CONFERENCE AND REPORT FOR CONTENTS OF SCHEDULING ORDER: Lead counsel for each party (or a designee attorney with appropriate authority) and any unrepresented party (except for a prisoner litigant proceeding pro se) shall confer at a scheduling conference as soon as practicable, but in any event no later than February 14, 2020. Joint Report due by 2/28/2020. See order for additional deadlines. (Ordered by Judge James Wesley Hendrix on 1/30/2020) (pnp) (Entered: 01/30/2020)
02/03/2020	<u>11</u>	MOTION Leave to Proceed Without Local Counsel filed by Patricia Stone with Brief/Memorandum in Support. (Gerstein, Charles) (Entered: 02/03/2020)
02/07/2020	<u>12</u>	REPLY filed by John Best, Allison Palmer, Tom Green County, Texas re: <u>6</u> MOTION to Dismiss (Rouse, R.) (Entered: 02/07/2020)
02/10/2020	<u>13</u>	ORDER granting <u>11</u> Motion to Proceed Without Local Counsel. (Ordered by Judge James Wesley Hendrix on 2/10/2020) (pnp) (Entered: 02/10/2020)

02/11/2020	<u>14</u>	MOTION for Leave to File Unopposed Motion for Leave To Proceed Without Local Counsel filed by John Best, Allison Palmer, Tom Green County, Texas (Attachments: # <u>1</u> Proposed Order) (Rouse, R.) (Entered: 02/11/2020)
02/12/2020	<u>15</u>	MOTION To Hold Motion to Dismiss in Abeyance or in the Alternative for Leave to File Surreply re <u>6</u> MOTION to Dismiss filed by Patricia Stone (Gerstein, Charles) (Entered: 02/12/2020)
02/12/2020	<u>16</u>	ORDER granting <u>14</u> Motion for Leave to Proceed Without Local Counsel. (Ordered by Judge James Wesley Hendrix on 2/12/2020) (pnp) (Entered: 02/12/2020)
02/12/2020	19	ELECTRONIC Minute Entry for proceedings held before Judge James Wesley Hendrix: Telephonic Scheduling Conference held on 2/12/2020. Attorney Appearances: Plaintiff – Charles Gerstein; Defense – Layne Rouse. (Court Reporter: Mechelle Daniel) (No exhibits) Time in Court – :30. (chmb) (Entered: 02/13/2020)
02/13/2020	<u>17</u>	SCHEDULING ORDER for Motions for Summary Judgment: The parties are ordered to confer and file a list of stipulated facts by no later than 2/27/2020. Parties shall file motions for summary judgment no later than 3/05/2020. Responses shall be filed no later than 14 days after the motions are filed. Replies are due no later than seven days after responses are filed. (Ordered by Judge James Wesley Hendrix on 2/13/2020) (pnp) Modified deadline on 2/13/2020 (pnp). (Entered: 02/13/2020)
02/13/2020	<u>18</u>	ORDER granting in part <u>15</u> Unopposed Motion to Hold Motion to Dismiss in Abeyance and denying in part <u>15</u> Request for leave to file a sur-reply in opposition to the motion to dismiss is denied as moot. (Ordered by Judge James Wesley Hendrix on 2/13/2020) (pnp) (Entered: 02/13/2020)
02/14/2020	<u>20</u>	Application for Admission Pro Hac Vice with Certificate of Good Standing (Filing fee \$100; Receipt number 0539-10624463) filed by Patricia Stone (Attachments: # <u>1</u> Exhibit(s) Certificate of Good Standing) Attorney Eric Halperin added to party Patricia Stone(pty:pla) (Halperin, Eric) (Entered: 02/14/2020)
02/18/2020	<u>21</u>	ORDER granting <u>20</u> Application for Admission Pro Hac Vice of Eric Halperin. Important Reminder: Unless excused for cause, an attorney who is not an ECF user must register within 14 days of the date the attorney appears in a case pursuant to LR 5.1(f) and LCrR 49.2(g). (Ordered by Judge James Wesley Hendrix on 2/18/2020) (pnp) (Entered: 02/18/2020)
02/27/2020	<u>22</u>	Proposed STIPULATION of Facts by John Best, Allison Palmer, Tom Green County, Texas. (Rouse, R.) (Entered: 02/27/2020)
02/27/2020	<u>23</u>	Appendix in Support filed by John Best, Allison Palmer, Tom Green County, Texas re <u>22</u> Stipulation (Attachments: # <u>1</u> Exhibit(s)) (Rouse, R.) (Entered: 02/27/2020)
03/05/2020	<u>24</u>	MOTION for Partial Summary Judgment filed by Patricia Stone (Gerstein, Charles) (Entered: 03/05/2020)
03/05/2020	<u>25</u>	Brief/Memorandum in Support filed by Patricia Stone re <u>24</u> MOTION for Partial Summary Judgment (Gerstein, Charles) (Entered: 03/05/2020)
03/05/2020	<u>26</u>	MOTION for Summary Judgment filed by John Best, Allison Palmer, Tom Green County, Texas (Attachments: # <u>1</u> Proposed Order) (Rouse, R.) (Entered: 03/05/2020)
03/05/2020	<u>27</u>	Brief/Memorandum in Support filed by John Best, Allison Palmer, Tom Green County, Texas re <u>26</u> MOTION for Summary Judgment (Rouse, R.) (Entered: 03/05/2020)