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9 Attorneys for Defendants

10 IN THE UNITED STATES DISTRICT COURT  
 11 FOR THE EASTERN DISTRICT OF CALIFORNIA  
 12 SACRAMENTO DIVISION

14 **RALPH COLEMAN, et al.,**  
 15  
 16 Plaintiffs,  
 17  
 18 **EDMUND G. BROWN JR., et al.,**  
 19 Defendants.

2:90-cv-00520 LKK JFM P

**STIPULATION AND ORDER RE:  
 DEFENDANTS' PLAN ON THE  
 INTERMEDIATE CARE FACILITY AND  
 ACUTE INPATIENT WAITLISTS**

20  
 21 On November 24, 2010, Defendants filed their Plan Re: Intermediate Care Facility and  
 22 Acute Inpatient Waitlists (Defendants' Plan). (Docket No. 3962.) Thereafter, the parties  
 23 participated in several telephone conference calls with the *Coleman* Special Master to reach  
 24 agreement concerning the scope and content of Defendant's Plan. Having failed to reach  
 25 agreement concerning all aspect of Defendants' Plan, the parties, by and through their counsel,  
 26 stipulate as follows:

- 27 1. Defendants will have up to and including February 4, 2011, to submit to the  
 28 Special Master and to Plaintiffs' counsel supplemental material on Section II.A., Extended

1 Enhanced Outpatient Program Care Plan (Docket No. 3962-1 at pp. 6-8), and Section II.B.1.b,  
2 Psychological Assessment Plan (Docket No. 3962-1 at p. 10), of Defendants' Plan;

3 2. Plaintiffs shall have up to and including February 25, 2011, to file with the Court  
4 any objections to Defendants' Plan. Plaintiffs' filing shall not include any objections to the  
5 following sections of Defendants' Plan: (a) Section II.B.1.c, Initiation of a Statewide Clozapine  
6 Initiation Policy (Docket No. 3962-1 at p. 10); (b) Section II.B.1.d, Positive Behavioral Services  
7 (Docket No. 3962-1 at p. 11); (c) Section II.B.1.e., Review of SVPP and APP Waitlists (Docket  
8 No. 3962-1 at pp. 11-15); (d) Section II.B.2, Concurrent Review (Docket No. 3962-1 at pp. 15-  
9 16); (e) Section II.B.3.b, Frequent Inpatient Hospitalizations (Docket No. 3962-1 at p. 16); (f)  
10 Section II.B.4, Additional Transition Planning and Continuity of Care Processes (Docket No.  
11 3962-1 at 17); and (g) Section II.D., SharePoint (Docket No. 3962-1 at pp. 19-20.) By entering  
12 into this stipulation, Plaintiffs do not waive their right to object to any other section of  
13 Defendants' Plan; and

14 3. Defendants shall have up to and including March 18, 2011, to file with the Court  
15 any responses to Plaintiffs' objections to Defendants' Plan. By entering into this stipulation,  
16 Defendants do not waive any of their rights.

17 The parties have met and conferred with the *Coleman* Special Master Matthew Lopes, Jr.  
18 and he is in agreement with this stipulation.

19 SO STIPULATED

20 Dated: February 2, 2011

By: /s/ Debbie J. Vorous

21 Debbie J. Vorous  
22 Office of the Attorney General  
23 Attorneys for Defendants

24 Dated: February 2 2011

By: /s/ Jane Kahn

25 Jane Kahn  
26 Rosen, Bien & Galvan  
27 Attorneys for Plaintiffs

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SO ORDERED

The above stipulation is the Order of this Court.

Dated: February 7, 2011



LAWRENCE K. KARLTON  
SENIOR JUDGE  
UNITED STATES DISTRICT COURT