

1 DONALD SPECTER – 083925
 STEVEN FAMA – 099641
 2 PRISON LAW OFFICE
 1917 Fifth Street
 3 Berkeley, California 94710-1916
 Telephone: (510) 280-2621
 4

MICHAEL W. BIEN – 096891
 ERNEST GALVAN – 196065
 AARON J. FISCHER – 247391
 ROSEN, BIEN & GALVAN, LLP
 315 Montgomery Street, Tenth Floor
 San Francisco, California 94104-1823
 Telephone: (415) 433-6830

5 CLAUDIA CENTER – 158255
 THE LEGAL AID SOCIETY –
 6 EMPLOYMENT LAW CENTER
 180 Montgomery Street, Suite 600
 7 San Francisco, California 94104-4244
 Telephone: (415) 864-8848
 8

WARREN E. GEORGE – 053588
 BINGHAM McCUTCHEEN LLP
 Three Embarcadero Center
 San Francisco, California 94111-4066
 Telephone: (415) 393-2000

Attorneys for Plaintiffs

9 UNITED STATES DISTRICT COURT
 10 EASTERN DISTRICT OF CALIFORNIA
 11

12 RALPH COLEMAN, et al.,
 13 Plaintiffs,
 14 v.
 15 EDMUND G. BROWN, Jr., et al.,
 16 Defendants.
 17

Case No. Civ S 90-0520 LKK-JFM

**STIPULATION AND ORDER TO
 EXTEND TIME IN WHICH TO FILE
 MOTION FOR FEES, COSTS AND
 EXPENSES RELATED TO WORK
 BEFORE THREE-JUDGE COURT
 AND SUPREME COURT OF THE
 UNITED STATES**

Judge: Hon. Lawrence K. Karlton

18
 19
 20
 21 1. On June 15, 2011, the Court granted an extension to the stay of all attorneys’
 22 fees, costs and expenses matters related to the Three-Judge Court, and related appeals,
 23 including the proceedings before the Supreme Court of the United States, ordering that
 24 Plaintiffs’ application for fees, costs and expenses be submitted 60 days after August 26,
 25 2011.

26 2. The parties continue to meet and confer regarding Plaintiffs’ attorneys’ fees,
 27 costs, and expenses. These fees, costs, and expenses are separate from those approved in
 28 the recent order issued by the court in *Plata v. Brown*. (See *Coleman* Docket No. 4094.)

1 The purpose of this meet and confer process has been to exhaust any possibility of settling
2 these matters, or of narrowing the disputes as much as possible. In order to allow that
3 process to continue and, if possible, to succeed, the parties jointly request a further
4 extension that provides additional time to meet and confer.

5 3. The parties therefore request that the Court extend the deadline for filing the
6 fees and costs application for matters related to the Three-Judge Court, and related appeals,
7 including the appeal to the Supreme Court of the United States to November 18, 2011.
8 The parties agree that the hearing will not be noticed for December 9th or 16th, 2011.

9 IT IS SO STIPULATED.

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED: October 20, 2011

Respectfully submitted,

ROSEN, BIEN & GALVAN, LLP

By: /s/ Ernest Galvan
Ernest Galvan

Attorneys for Plaintiffs

DATED: October 20, 2011

CALIFORNIA DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL

By: /s/ Debbie Vorous
Debbie Vorous
Deputy Attorney General

Attorneys for Defendants


1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

Pursuant to the stipulation of the parties, and good cause appearing, this Court extends the stay of all outstanding attorneys' fees, costs, and expenses matters related to the Three-Judge Court, and related appeals, including the proceedings before the Supreme Court of the United States. The unresolved fees, costs, and expenses related to these proceedings are separate from the fees, costs, and expenses that have been resolved by stipulation between the Prison Law Office and Defendants and the *Plata v. Brown* court's order. Plaintiffs shall submit their motion for fees, costs, and expenses on the aforementioned matter no later than November 18, 2011. For the duration of the stay, any and all deadlines relating to motions or claims for attorneys' fees, costs, and expenses contained in the Federal Civil Rules, the Federal Appellate Rules, the U.S. Supreme Court Rules, and/or the Local Rules for the Eastern District of California do not apply.

IT IS SO ORDERED.

DATED: October 24, 2011


LAWRENCE K. KARLTON
SENIOR JUDGE
UNITED STATES DISTRICT COURT