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Attorneys for Plaintiffs

9 UNITED STATES DISTRICT COURT  
 10 EASTERN DISTRICT OF CALIFORNIA  
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12 RALPH COLEMAN, et al.,  
 13 Plaintiffs,  
 14 v.  
 15 EDMUND G. BROWN, Jr., et al.,  
 16 Defendants.  
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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

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

25 2. The parties continue to meet and confer regarding Plaintiffs’ attorneys’ fees,  
 26 costs, and expenses. These fees, costs, and expenses are separate from those approved in  
 27 the recent order issued by the court in *Plata v. Brown*. (See *Coleman* Docket No. 4094.)  
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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 December 16, 2011. The  
8 parties agree that the hearing will not be noticed for January 13th or 20th, 2012.

9 IT IS SO STIPULATED.

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DATED: Nov. 15, 2011

Respectfully submitted,

ROSEN, BIEN & GALVAN, LLP

By: /s/ Ernest Galvan  
Ernest Galvan

Attorneys for Plaintiffs

DATED: Nov. 15, 2011

CALIFORNIA DEPARTMENT OF JUSTICE  
OFFICE OF THE ATTORNEY GENERAL

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


Attorneys for Defendants

1 **ORDER**

2 Pursuant to the stipulation of the parties, and good cause appearing, this Court  
3 extends the stay of all outstanding attorneys' fees, costs, and expenses matters related to  
4 the Three-Judge Court, and related appeals, including the proceedings before the Supreme  
5 Court of the United States. The unresolved fees, costs, and expenses related to these  
6 proceedings are separate from the fees, costs, and expenses that have been resolved by  
7 stipulation between the Prison Law Office and Defendants and the *Plata v. Brown* court's  
8 order. Plaintiffs shall submit their motion for fees, costs, and expenses on the  
9 aforementioned matter no later than December 16, 2011. For the duration of the stay, any  
10 and all deadlines relating to motions or claims for attorneys' fees, costs, and expenses  
11 contained in the Federal Civil Rules, the Federal Appellate Rules, the U.S. Supreme Court  
12 Rules, and/or the Local Rules for the Eastern District of California do not apply.

13 IT IS SO ORDERED.

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15 DATED: November 15, 2011

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18 LAWRENCE K. KARLTON  
19 SENIOR JUDGE  
20 UNITED STATES DISTRICT COURT  
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