

1 KAMALA D. HARRIS  
 Attorney General of California  
 2 JONATHAN L. WOLFF  
 Senior Assistant Attorney General  
 3 JAY C. RUSSELL  
 PATRICK R. MCKINNEY  
 4 Supervising Deputy Attorneys General  
 MANEESH SHARMA, State Bar No. 280084  
 5 Deputy Attorney General  
 455 Golden Gate Avenue, Suite 11000  
 6 San Francisco, CA 94102-7004  
 Telephone: (415) 703-5553  
 7 Fax: (415) 703-1234  
 E-mail: maneesh.sharma@doj.ca.gov  
 8 *Attorneys for Defendants*

Hanson Bridgett LLP  
 JERROLD C. SCHAEFER, State Bar No. 39374  
 PAUL B. MELLO, State Bar No. 179755  
 WALTER R. SCHNEIDER, State Bar No. 173113  
 SAMANTHA D. WOLFF, State Bar No. 240280  
 MEGAN OLIVER THOMPSON, SBN 256654  
 425 Market Street, 26th Floor  
 San Francisco, California 94105  
 Telephone: (415) 777-3200  
 Fax: (415) 541-9366  
 E-mail: pmello@hansonbridgett.com

9  
 10 IN THE UNITED STATES DISTRICT COURTS  
 11 FOR THE EASTERN DISTRICT OF CALIFORNIA  
 12 AND THE NORTHERN DISTRICT OF CALIFORNIA  
 13 UNITED STATES DISTRICT COURT COMPOSED OF THREE JUDGES  
 14 PURSUANT TO SECTION 2284, TITLE 28 UNITED STATES CODE

15 **RALPH COLEMAN, et al.,**  
 16 Plaintiffs,  
 17 v.  
 18 **EDMUND G. BROWN JR., et al.,**  
 19 Defendants.  
 20

2:90-cv-00520 KJM DAD PC  
**THREE-JUDGE COURT**

21 **MARCIANO PLATA, et al.,**  
 22 Plaintiffs,  
 23 v.  
 24 **EDMUND G. BROWN JR., et al.,**  
 25 Defendants.  
 26

C01-1351 TEH  
**THREE-JUDGE COURT**  
**STIPULATION AND ~~PROPOSED~~**  
**ORDER IN RESPONSE TO**  
**NOVEMBER 14, 2014 ORDER**

1 **STIPULATION**

2 In its November 14, 2014 Order, the Three-Judge Court ordered the parties to meet-and-  
3 confer regarding Plaintiffs’ requests for Defendants to (1) expand 2-for-1 credits for minimum  
4 custody inmates who are ineligible for fire camps; and (2) expand credit earning from 20% to  
5 33.3% for all non-violent second-strike offenders, including those with a prior sex offense.

6 The parties, with the assistance of the Compliance Officer, met and conferred and  
7 stipulate and agree to the following:

8 1. Starting January 1, 2015, Defendants shall expand 2-for-1 credits to all inmates  
9 designated as Minimum Custody A or Minimum Custody B pursuant to Cal. Code of Regs tit. 15,  
10 sec. 3377.1 who are currently eligible to earn day-for-day credits (50%). This new credit measure  
11 will be applied prospectively. This agreement will allow inmates to continue participating in fire  
12 camps, where they live and work outside the secure perimeter of prisons and can obtain valuable  
13 skills and training that will prepare them for reentry into society.

14 2. Plaintiffs withdraw their demand that CDCR expand 33.3% credit earnings to all  
15 non-violent second strike offenders, including those who have to register under Penal Code  
16 section 290.

17 3. The parties’ agreement resolves all outstanding issues raised in Plaintiffs’ Motion  
18 for Further Enforcement Order, filed September 16, 2014, that were the subject of the court-  
19 ordered meet-and-confer.

20  
21 Dated: December 12, 2014

KAMALA D. HARRIS  
Attorney General of California

22  
23 By: /s/ *Patrick R. McKinney*  
PATRICK R. MCKINNEY  
24 Supervising Deputy Attorney General  
*Attorneys for Defendants*

25 Dated: December 12, 2014

HANSON BRIDGETT LLP

26 By: /s/ *Paul B. Mello*  
PAUL B. MELLO  
27 *Attorneys for Defendants*  
28

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

Dated: December 12, 2014

PRISON LAW OFFICE

BY: /s/ *Donald Specter* (as authorized  
12/12/14)  
DONALD SPECTER  
*Attorneys for Plaintiffs*

Dated: December 12, 2014


ROSEN BIEN GALVAN & GRUNFELD LLP  
BY: /s/ *Michael W. Bien* (as authorized  
12/12/14)  
MICHAEL W. BIEN  
*Attorneys for Plaintiffs*

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


~~PROPOSED~~ ORDER

Pursuant to the foregoing stipulation, IT IS SO ORDERED.


Dated: 12/19/14

  
STEPHEN REINHARDT  
UNITED STATES CIRCUIT JUDGE  
NINTH CIRCUIT COURT OF APPEALS

Dated: 12/19/14

  
THELTON E. HENDERSON  
SENIOR UNITED STATES DISTRICT JUDGE  
NORTHERN DISTRICT OF CALIFORNIA

Dated: 12/19/14

  
KIMBERLY J. MUELLER  
UNITED STATES DISTRICT JUDGE  
EASTERN DISTRICT OF CALIFORNIA