

1 XAVIER BECERRA
 Attorney General of California
 2 WILLIAM C. KWONG
 Acting Senior Assistant Attorney General
 3 DANIELLE F. O'BANNON
 JAY C. RUSSELL
 4 Supervising Deputy Attorneys General
 ELISE OWENS THORN, State Bar No. 145931
 5 CHRISTINE M. CICCOTTI, State Bar No. 238695
 CHAD A. STEGEMAN, State Bar No. 225745
 6 TYLER V. HEATH, State Bar No. 271478
 Deputy Attorneys General
 7 1300 I Street, Suite 125
 P.O. Box 944255
 8 Sacramento, CA 94244-2550
 Telephone: (916) 324-4921
 9 Fax: (916) 324-5205
 E-mail: Elise.Thorn@doj.ca.gov
 10 *Attorneys for Defendants*

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

<p>15 RALPH COLEMAN, et al., 16 17 Plaintiffs, 18 v. 19 EDMUND G. BROWN JR., et al., 20 Defendants. 21 22</p>	<p>2:90-cv-00520 KJM-DB (PC) PARTIES' SUPPLEMENTAL STIPULATION AMENDING THE REQUEST TO EXTEND THE DEADLINE TO FILE AN ADDENDUM TO THE PROGRAM GUIDE REGARDING MENTAL HEALTH CRISIS BED TIMELINE EXCEPTIONS AND TO CONTINUE THE AUGUST 29, 2017 EVIDENTIARY HEARING AND RELATED DEADLINES</p>
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23 On July 27, 2017, the parties filed a stipulation and proposed order requesting an extension
 24 of the deadlines set in the Court's April 19, 2017 order, ECF No. 5610. (ECF No. 5653.) On
 25 August 1, 2017, the Court extended the deadline for the parties' joint report and continued the
 26 August 29, 2017 hearing. (ECF No. 5656.) With respect to the parties' request to continue the
 27 deadline to file an addendum to the Program Guide identifying exceptions, if any, to the Program
 28 Guide timelines for transfer to Mental Health Crisis Bed care until January 31, 2018, the Court

1 ordered the parties to file a supplemental stipulation clarifying the basis for the request. (*Id.* at 2.)

2 Upon receipt of the Court’s August 1, 2017 order, the parties conferred and agree that a
3 shorter period of time should be sufficient to discuss the scope and contours of the categories for
4 the addendum to the Program Guide. As contemplated by the Court’s August 1 order, the parties
5 hereby modify their July 27 request for a six-month extension to now request a four-month
6 extension up to and including November 30, 2017, to allow them time to work toward an
7 agreement on the exceptions and complete an addendum to the Program Guide using Defendants’
8 real-time crisis bed data in the context of the weekly workgroups described in the July 27
9 stipulation. This request is in line with the Court’s June 8, 2017 order approving the parties’
10 request to extend the time for the parties to complete and submit a joint proposal for an addendum
11 to the Program Guide that identifies exceptions to the Program Guide timeline for transfers to
12 acute and intermediate levels of care. (ECF No. 5631.)

13 After receiving the order, Plaintiffs’ counsel identified a conflict with the September 29,
14 2017 hearing date (Yom Kippur begins that evening), and the parties request the Court reschedule
15 the hearing date.

16 Accordingly, the parties stipulate as follows:

17 1. The parties shall continue to meet and confer weekly, either in-person or through
18 teleconferences, under the guidance of the Special Master, to (a) review and discuss data
19 presented by Defendants regarding potential obstacles to compliance with the 24-hour transfer
20 timeframe; (b) review Defendants’ application of the individual inmate exceptions and to refine
21 the precise contours of the three (or more) enumerated exceptions to the 24-hour timeframe; and
22 (c) develop solutions to address issues related to referral, treatment, and discharge of inmate-
23 patients to Mental Health Crisis Bed level of care. As part of the process for developing the
24 addendum, the parties will also develop, with the guidance of the Special Master, a process to
25 exchange written materials, including individual patient-level data, to discuss on a monthly basis
26 any Mental Health Crisis Bed transfer that may qualify for an exception to the Program Guide
27 timelines.

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