

1 DONALD SPECTER – 083925  
 STEVEN FAMA – 099641  
 2 MARGOT MENDELSON – 268583  
 PRISON LAW OFFICE  
 3 1917 Fifth Street  
 Berkeley, California 94710-1916  
 4 Telephone: (510) 280-2621

5 CLAUDIA CENTER – 158255  
 AMERICAN CIVIL LIBERTIES UNION  
 6 FOUNDATION OF NORTHERN  
 CALIFORNIA, INC.  
 7 39 Drumm Street  
 San Francisco, California 94111-4805  
 8 Telephone: (415) 621-2493

MICHAEL W. BIEN – 096891  
 JEFFREY L. BORNSTEIN – 099358  
 ERNEST GALVAN – 196065  
 THOMAS NOLAN – 169692  
 LISA ELLS – 243657  
 JENNY S. YELIN – 273601  
 MICHAEL S. NUNEZ – 280535  
 JESSICA WINTER – 294237  
 MARC J. SHINN-KRANTZ – 312968  
 CARA E. TRAPANI – 313411  
 ROSEN BIEN  
 GALVAN & GRUNFELD LLP  
 101 Mission Street, Sixth Floor  
 San Francisco, California 94105-1738  
 Telephone: (415) 433-6830

9 Attorneys for Plaintiffs

11 UNITED STATES DISTRICT COURT  
 12 EASTERN DISTRICT OF CALIFORNIA

14 RALPH COLEMAN, et al.,  
 15 Plaintiffs,  
 16 v.  
 17 GAVIN NEWSOM, et al.,  
 18 Defendants.

Case No. 2:90-CV-00520-KJM-DB

**STIPULATION AND ORDER  
 EXTENDING TIME TO FILE JOINT  
 REPORT ON MEDICATION  
 ADHERENCE POLICY REQUIRED  
 BY THE COURT’S AUGUST 14, 2019  
 ORDER [ECF NO. 6242]**

Judge: Hon. Kimberly J. Mueller

1           On August 14, 2019, the Court referred the issue of timeframes for and monitoring  
2 of medication non-adherence counseling sessions by CDCR psychiatrists and psychiatric  
3 nurse practitioners to the All-Parties Workgroup in this case for clarification. Aug. 14,  
4 2019 Order, ECF No. 6242 at 11. The Court directed that after engaging in the Workgroup  
5 process “under the guidance and leadership of the Special Master,” the parties “shall file a  
6 further joint report on this issue discussing the results of this additional work.” *Id.* The  
7 Court directed that the joint report be filed “[o]n or before November 1, 2019.” *Id.*

8           The parties have been working with the Special Master team to craft a clarifying  
9 memorandum on the issue of medication non-adherence counseling sessions by  
10 psychiatrists and psychiatric nurse practitioners. In addition to significant collaborative  
11 effort between the Special Master team and defendants throughout October, the parties and  
12 the Special Master team participated in two workgroup meetings during the week of  
13 October 28, 2019. Although the parties have made considerable progress, there are some  
14 remaining issues that the parties are working through, and the parties require an additional  
15 two weeks to complete the Workgroup process and file a complete joint report on this  
16 issue.

17           The parties agree that a two-week extension of time to file the joint report required  
18 by the Court’s August 14, 2019 Order is appropriate, extending the time for the required  
19 filing from Friday November 1, 2019 to Friday November 15, 2019.

20           The parties have shared this stipulation and proposed order with the Special Master  
21 and he concurs with the parties’ request for an extension of time.

22           **IT IS SO STIPULATED.**

23  
24  
25  
26  
27  
28

[3456867.1]

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: October 31, 2019

Respectfully submitted,  
ROSEN BIEN GALVAN & GRUNFELD LLP

By: /s/ Cara E. Trapani  
Cara E. Trapani

Attorneys for Plaintiffs

DATED: October 31, 2019

XAVIER BECERRA  
Attorney General of California  
ADRIANO HRVATIN  
Supervising Deputy Attorney General

By: /s/ Elise Owens Thorn  
Elise Owens Thorn  
Deputy Attorney General

Attorneys for Defendants

**IT IS SO ORDERED.**

DATED: November 1, 2019.

  
UNITED STATES DISTRICT JUDGE

[3456867.1]