

1 XAVIER BECERRA
 Attorney General of California
 2 MONICA N. ANDERSON
 Senior Assistant Attorney General
 3 ADRIANO HRVATIN
 Supervising Deputy Attorney General
 4 KYLE A. LEWIS, State Bar No. 201041
 ELISE OWENS THORN, State Bar No. 145931
 5 TYLER V. HEATH, State Bar No. 271478
 Deputy Attorneys General
 6 1300 I Street, Suite 125
 P.O. Box 944255
 7 Sacramento, CA 94244-2550
 Telephone: (916) 210-7318
 8 Fax: (916) 324-5205
 E-mail: Elise.Thorn@doj.ca.gov
 9 *Attorneys for Defendants*

ROMAN M. SILBERFELD, State Bar No. 62783
 GLENN A. DANAS, State Bar No. 270317
 ROBINS KAPLAN LLP
 2049 Century Park East, Suite 3400
 Los Angeles, CA 90067-3208
 Telephone: (310) 552-0130
 Fax: (310) 229-5800
 E-mail: RSilberfeld@RobinsKaplan.com
Special Counsel for Defendants

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

15 **RALPH COLEMAN, et al.,**
 16 Plaintiffs,
 17 v.
 18 **GAVIN NEWSOM, et al.,**
 19 Defendants.
 20

Case No. 2:90-cv-00520 KJM-DB (PC)

**STIPULATION AND ORDER TO
 EXTEND TIME TO FILE STIPULATION
 IDENTIFYING PROGRAM GUIDE
 DEPARTURES**

21 On April 17, 2020, the Court ordered the parties to file by May 1, 2020 a stipulation
 22 identifying the “temporary departures from certain Program Guide requirements” for the
 23 provision of mental health care that Defendants had implemented in response to the COVID-19
 24 pandemic. (ECF No. 6622 at 2-3.) The parties met and conferred in response to the Court’s April
 25 17 order, and determined more time would be necessary to come to agreement on the content of
 26 the stipulation. (ECF No. 6652 at 2.) Accordingly, the parties requested and the Court granted
 27 the parties an extension until May 15, 2020 to file the stipulation. (*Id.* at 2, 3.)
 28

[3545068.2]

1 Since the initial meet and confer, the parties have continued to negotiate, under the Special
2 Master’s supervision, the content of the Court-ordered stipulation identifying COVID-19-based
3 departures from Program Guide requirements for mental health treatment and programming.
4 During this period, the parties have exchanged draft stipulations and discussed various provisions,
5 with the mutual goal of reaching a stipulation concerning this issue. Twice during the afternoon
6 of May 15, Defendants sent Plaintiffs a version of the draft stipulation, but for reasons unknown
7 to the parties, Plaintiffs did not receive that correspondence. The parties discovered this technical
8 issue after the close of business today and continued their negotiations on the limited remaining
9 points, but both sides determined that additional time is needed to reach an agreement.

10 The parties believe that, with a short extension of time, they will complete negotiations and
11 reach a stipulation identifying the temporary departures from certain Program Guide requirements
12 for the provision of mental health care that Defendants had implemented in response to the
13 COVID-19 pandemic. Accordingly, the parties request an extension of three business days from
14 the present due date, such that their stipulation would be due by Wednesday, May 20, 2020.

15 The Special Master is aware of and approves this stipulated request for additional time.

16 ///

17 ///

18 ///

19
20
21
22
23
24
25
26
27
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: May 15, 2020

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

/s/ Kyle A. Lewis
Kyle A. Lewis
Deputy Attorney General
Attorneys for Defendants


Dated: May 15, 2020

ROSEN BIEN GALVAN & GRUNFELD LLP

/s/ Lisa Ells
Lisa Ells
Attorneys for Plaintiffs

IT IS SO ORDERED.

DATED: May 18, 2020.



CHIEF UNITED STATES DISTRICT JUDGE