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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

RALPH COLEMAN, et al.,  
  
Plaintiffs,  
  
v.  
  
GAVIN NEWSOM, et al.,  
  
Defendants.

Case No. 2:90-CV-00520-KJM-DB  
  
**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE FIRST  
ANNUAL UPDATE TO THE  
PROGRAM GUIDE AND  
COMPENDIUM**  
  
Judge: Hon. Kimberly J. Mueller

[3784630.4]

1 Pursuant to the Court’s August 3, 2020 order, the parties are required to file, by  
2 September 1, 2021, the first Annual Update to the Program Guide and Compendium of  
3 Additional Remedial Measures and a joint submission on the efficacy of the provisional  
4 updating process, with input from the Special Master as to each. *See* ECF No. 6806.

5 The parties have met and conferred regarding the contents of the Annual Update  
6 and are working diligently to resolve disputes, but negotiations are ongoing. Additionally,  
7 the parties and Special Master need more time to have focused discussions regarding “the  
8 efficacy of the updating process the court provisionally approve[d]” in the August 3, 2020  
9 order, including discussion of “any proposed amendments to the process.” ECF No. 6806  
10 at 2-4. In order to give the parties additional time to try to reach agreement and receive  
11 approval from the Special Master as to the Annual Update, and to complete discussions on  
12 possible amendments to the process with the Special Master’s input and guidance, the  
13 parties jointly request a 21-day extension of time to complete the filing, such that the  
14 filings anticipated by the August 3, 2020 order will be due on September 22, 2021.

15 The Special Master has reviewed this stipulation and supports it, and further  
16 requests that these issues be placed on the agenda for the forthcoming October 1, 2021  
17 status conference. The parties support that request.

18  
19 DATED: August 31, 2021

Respectfully submitted,

ROSEN BIEN GALVAN & GRUNFELD LLP

By: */s/ Lisa Ells*

\_\_\_\_\_  
Lisa Ells

Attorneys for Plaintiffs

1 DATED: August 31, 2021

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Attorney General of California  
Damon McClain  
Supervising Deputy Attorney General

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4 By: /s/ Damon McClain  
5 Damon McClain  
6 Supervising Deputy Attorney General

7 Attorneys for Defendants

8 DATED: August 31, 2021

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10 By: /s/ Samantha Wolff  
11 PAUL B. MELLO  
SAMANTHA D. WOLFF

12 Attorneys for Defendants

13  
14  
15 **ORDER**

16 **IT IS SO ORDERED.**

17  
18 DATED: September 1, 2021.

  
\_\_\_\_\_  
CHIEF UNITED STATES DISTRICT JUDGE