

1 SHAWNA BALLARD, State Bar No. 155188  
 KATE FALKENSTIEN, State Bar No. 313753  
 2 Reichman Jorgensen Lehman & Feldberg LLP  
 100 Marine Parkway, Suite 300  
 3 Redwood Shores, CA 94065  
 Telephone: (650) 623-1401  
 4 Fax: (650) 623-1449  
 Email: sballard@reichmanjorgensen.com  
 5 kfalkenstien@reichmanjorgensen.com

BRIAN C. BARAN, State Bar No. 325939  
 Reichman Jorgensen Lehman & Feldberg LLP  
 1710 Rhode Island Ave NW, 12th Floor  
 Washington, DC 20036  
 Telephone: (202) 894-7310  
 Fax: (650) 623-1449  
 Email: bbaran@reichmanjorgensen.com

6 *Attorneys for Plaintiff-Intervenor*  
 Christopher Lipsey

7  
 8 ROB BONTA, State Bar No. 202668  
 Attorney General of California  
 MONICA N. ANDERSON, State Bar No. 182970  
 Senior Assistant Attorney General  
 9 DAMON MCCLAIN, State Bar No. 209508  
 Supervising Deputy Attorney General  
 10 ELISE OWENS THORN, State Bar No. 145931  
 NAMRATA KOTWANI, State Bar No. 308741  
 Deputy Attorneys General  
 11 1300 I Street, Suite 125  
 P.O. Box 944255  
 12 Sacramento, CA 94244-2550  
 Telephone: (916) 210-7318  
 13 Fax: (916) 324-5205  
 E-mail: Elise.Thorn@doj.ca.gov  
 14 *Attorneys for Defendants*

HANSON BRIDGETT LLP  
 PAUL B. MELLO, State Bar No. 179755  
 SAMANTHA D. WOLFF, State Bar No. 240280  
 LAUREL E. O'CONNOR, State Bar No. 305478  
 DAVID C. CASARRUBIAS, State Bar No. 321994  
 1676 N. California Boulevard, Suite 620  
 Walnut Creek, CA 94596  
 Telephone: (925) 746-8460  
 Fax: (925) 746-8490  
 E-mail: PMello@hansonbridgett.com  
*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*

18 IN THE UNITED STATES DISTRICT COURT  
 19 FOR THE EASTERN DISTRICT OF CALIFORNIA  
 20 SACRAMENTO DIVISION

23 **RALPH COLEMAN, et al.**  
 24 Plaintiffs,  
 25 v.  
 26 **GAVIN NEWSOM, et al.,**  
 27 Defendants.  
 28

Case No. 2:90-cv-00520 KJM DB P

**STIPULATION AND ORDER EXTENDING  
 DEADLINES FOR ADJUDICATING  
 PLAINTIFF-INTERVENOR CHRISTOPHER  
 LIPSEY'S CLAIM**

Judge: Hon. Kimberly Mueller  
 Action Filed: April 23, 1990

1 On June 3, 2021, the Court issued an order adopting the parties' proposed schedule to  
2 adjudicate Plaintiff-Intervenor Christopher Lipsey's claim in intervention. *See* ECF No. 7191. Under  
3 that schedule, fact discovery was to be completed by October 29, 2021. *Id.* ¶ 2. Other deadlines for  
4 expert discovery and dispositive and *Daubert* motions followed from the fact discovery cutoff. *Id.* ¶  
5 3.

6  
7 Lipsey and Defendants have been actively engaged in discovery but need more time to  
8 complete it. The magistrate judge granted in part Lipsey's motion to compel on September 10, 2021,  
9 requiring time for the parties to negotiate the additional document productions contemplated by that  
10 order and time for Defendants to review and produce documents accordingly. Additionally, while  
11 Defendants had initially completed their production of documents not at issue in the motion to compel  
12 on August 25, 2021, they recently discovered an error in the execution of search terms that  
13 significantly expands the volume of documents to be reviewed and produced. Given these outstanding  
14 tasks to complete document production, it is not feasible for Defendants to finish producing  
15 documents, Lipsey to review the newly produced documents, and the parties to complete depositions  
16 by October 29. The parties therefore request an extension of discovery deadlines.

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18 **IT IS STIPULATED AS FOLLOWS:**

19 The parties jointly stipulate and request that the deadlines set forth in the June 3, 2021 order  
20 be extended as follows:

- 21 1. Fact discovery shall be completed by December 16, 2021.
- 22 2. The parties shall disclose experts by January 14, 2022.
- 23 3. The parties shall disclose rebuttal experts by January 28, 2022.
- 24 4. All expert discovery shall be completed by February 11, 2022.
- 25 5. Dispositive and *Daubert* motions shall be filed by March 4, 2022 and shall be noticed for  
26 hearing and briefing in accordance with the provisions of Local Rule 230.  
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28

1 6. If necessary, an evidentiary hearing will be set for a date in June or July 2022.

2  
3 Dated: September 28, 2021

Respectfully submitted,

4 /s/ Kate Falkenstien

/s/ Elise Owens Thorn (as authorized on 9/28/21)

5 REICHMAN JORGENSEN  
6 LEHMAN & FELDBERG LLP  
7 Shawna L. Ballard (SBN 155188)  
8 Kate Falkenstien (SBN 313753)  
9 100 Marine Parkway, Suite 300  
10 Redwood Shores, California 94065  
11 Telephone: (650) 623-1401  
12 Fax: (650) 623-1449  
13 sballard@reichmanjorgensen.com  
14 kfalkenstien@reichmanjorgensen.com

ROB BONTA  
Attorney General of California  
DAMON MCCLAIN  
Supervising Deputy Attorney General

ELISE OWENS THORN  
Deputy Attorney General

*Attorneys for Defendants*

11 REICHMAN JORGENSEN  
12 LEHMAN & FELDBERG LLP  
13 Brian C. Baran (SBN 325939)  
14 1710 Rhode Island Ave NW, 12th Floor  
15 Washington, DC 20036  
16 Telephone: (202) 894-7310  
17 Fax: (650) 623-1449  
18 bbaran@reichmanjorgensen.com

*Attorneys for Plaintiff-Intervenor  
Christopher Lipsev*

17 **IT IS SO ORDERED.**

18 Dated: October 13, 2021.

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22 CHIEF UNITED STATES DISTRICT JUDGE  
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