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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 In THE UNITED STATES DISTRICT COURT For THE EASTERN DISTRICT OF CALIFORNIA SACRAMENTO DIVISION RALPH COLEMAN, et al., Case No. 2:90-cv-00520 KJM-DB (PC) STIPULATION AND ORDER Judge: The Hon. Kimberly J. Mueller		PAUL B. MELLO, State Bar No. 179755	Email: sballard@reichmanjorgensen.com
11 DAVID C. CASARRUBIAS, State Bar No. 321994 1676 N. California Boulevard, Suite 620 BRIAN C. BARAN, State Bar No. 325939 12 Walnut Creck, CA 94596 Reichman Jorgensen Lehman & Feldberg LLP 1710 Rhode Island Ave NW, 12th Floor 13 Fax: (925) 746-8460 Telephone: (925) 746-8490 14 Attorneys for Defendants Telephone: (202) 894-7310 14 Attorneys for Defendants Fax: (650) 623-1449 15 Fax: (650) 623-1449 16 Fax: (650) 623-1449 17 For The EASTERN DISTRICT COURT 18 IN THE UNITED STATES DISTRICT COURT 19 FOR THE EASTERN DISTRICT OF CALIFORNIA 20 SACRAMENTO DIVISION 21 RALPH COLEMAN, et al., 22 Plaintiffs, 23 v. 24 v. 25 GAVIN NEWSOM, et al., 26 Defendants.	10	SAMANTHA D. WOLFF, State Bar No. 240280 LAUREL E. O'CONNOR, State Bar No. 305478	kfalkenstien@reichmanjorgensen.com
12 Walnut Creek, CA 94596 Telephone: (925) 746-8460 Fax: (925) 746-8490 E-mail: PMello@hansonbridgett.com Attorneys for Defendants 1710 Rhode Island Ave NW, 12th Floor Washington, DC 20036 Telephone: (202) 894-7310 Fax: (650) 623-1449 Email: bbaran@reichmanjorgensen.com 15 Attorneys for Defendants Fax: (650) 623-1449 16 Fax: (925) 746-8460 Telephone: (202) 894-7310 Fax: (650) 623-1449 17 Attorneys for Defendants Fax: (650) 623-1449 18 IN THE UNITED STATES DISTRICT COURT 19 FOR THE EASTERN DISTRICT OF CALIFORNIA 20 SACRAMENTO DIVISION 21 Plaintiffs, 22 Plaintiffs, 23 v. 24 v. 25 GAVIN NEWSOM, et al., 26 Defendants. 27 Defendants.	11	DAVID C. CASARRUBIAS, State Bar No. 321994	
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16 IN THE UNITED STATES DISTRICT COURT 18 IN THE UNITED STATES DISTRICT COURT 19 FOR THE EASTERN DISTRICT OF CALIFORNIA 20 SACRAMENTO DIVISION 21 RALPH COLEMAN, et al., 23 V. 24 V. 25 GAVIN NEWSOM, et al., 26 Defendants. 27 Defendants.	14		
 IN THE UNITED STATES DISTRICT COURT IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA SACRAMENTO DIVISION RALPH COLEMAN, et al., Plaintiffs, V. Case No. 2:90-ev-00520 KJM-DB (PC) STIPULATION AND ORDER Judge: The Hon. Kimberly J. Mueller GAVIN NEWSOM, et al., Defendants. 	15		
 IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA SACRAMENTO DIVISION RALPH COLEMAN, et al., Plaintiffs, V. Case No. 2:90-cv-00520 KJM-DB (PC) STIPULATION AND ORDER Judge: The Hon. Kimberly J. Mueller GAVIN NEWSOM, et al., Defendants. 	16		Christopher Lipsey
IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA SACRAMENTO DIVISION RALPH COLEMAN, et al., RALPH COLEMAN, et al., Case No. 2:90-cv-00520 KJM-DB (PC) STIPULATION AND ORDER Judge: The Hon. Kimberly J. Mueller GAVIN NEWSOM, et al., Defendants.	17		
19FOR THE EASTERN DISTRICT OF CALIFORNIA20SACRAMENTO DIVISION21Case No. 2:90-ev-00520 KJM-DB (PC)22Plaintiffs,23Case No. 2:90-ev-00520 KJM-DB (PC)24STIPULATION AND ORDER25GAVIN NEWSOM, et al.,26Defendants.27Efendants.	18		
20SACRAMENTO DIVISION21RALPH COLEMAN, et al.,Case No. 2:90-cv-00520 KJM-DB (PC)22Plaintiffs,Case No. 2:90-cv-00520 KJM-DB (PC)23v.STIPULATION AND ORDER24v.Judge: The Hon. Kimberly J. Mueller25GAVIN NEWSOM, et al.,Defendants.26Defendants.	19		
21 22RALPH COLEMAN, et al., Plaintiffs,Case No. 2:90-ev-00520 KJM-DB (PC) STIPULATION AND ORDER23v.STIPULATION AND ORDER24v.Judge: The Hon. Kimberly J. Mueller25GAVIN NEWSOM, et al., Defendants.Defendants.	20	FOR THE EASTERN DISTRICT OF CALIFORNIA	
22RALPH COLEMAN, et al.,Case No. 2:90-cv-00520 KJM-DB (PC)23Plaintiffs,STIPULATION AND ORDER24v.Judge: The Hon. Kimberly J. Mueller25GAVIN NEWSOM, et al.,Defendants.26Defendants.Value	21	SACRAMEN	TO DIVISION
23Plaintiffs,STIPULATION AND ORDER24v.Judge: The Hon. Kimberly J. Mueller25GAVIN NEWSOM, et al.,Defendants.26Defendants.		RALPH COLEMAN, et al.,	Case No. 2:90-cv-00520 KJM-DB (PC)
24v.Judge: The Hon. Kimberly J. Mueller25GAVIN NEWSOM, et al.,26Defendants.27		Plaintiffs,	STIPULATION AND ORDER
25 GAVIN NEWSOM, et al., 26 Defendants.		v.	
26 Defendants. 27			Judge: The Hon. Kimberly J. Mueller
27			
	26	Defendants.	
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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. ECF No. 7191. On		
3	December 9, 2021, the parties stipulated to, and the Court ordered, an extension of the discovery		
4	deadlines. ECF No. 7393.		
5	Lipsey and Defendants have been actively working to complete discovery on schedule.		
6	Defendants have completed their document production, and Lipsey is in the process of		
7	responding to Defendants' second set of discovery requests. The parties, including counsel		
8	representing Lipsey, Defendants, and Coleman class counsel, met and conferred and agree that		
9	efforts to resolve Plaintiff-Intervenor Lipsey's claim without litigation should be exhausted, with		
10	input from the Special Master and his suicide prevention expert, on the security and welfare		
11	check policy that requires the use of Guard One. To allow time to explore settlement, the parties		
12	jointly request the Court enter an order referring the issues raised in Lipsey's complaint in		
13	intervention to Magistrate Judge Kendall Newman for mediation and extending the deadlines set		
14	forth in the December 9, 2021 order, ECF No. 7393, by approximately sixty days, as follows:		
15	1. Fact discovery shall be completed by April 29, 2022, except that the deadline for serving		
16	requests for production, interrogatories or requests for admission will be deemed to have expired;		
17	2. The parties shall disclose experts by May 24, 2022;		
18	3. The parties shall disclose rebuttal experts by June 21, 2022;		
19	4. All expert discovery shall be completed by July 15, 2022;		
20	5. Dispositive and <i>Daubert</i> motions shall be filed by August 2, 2022, and shall be noticed		
21	for hearing and briefing in accordance with the provisions of Local Rule 230; and		
22	6. If necessary, an evidentiary hearing will be set for a date in November 2022.		
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1	IT IS SO STIPULATED.	
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3	Dated: February 16, 2022	Respectfully submitted,
4	/s/ Brian Baran	<u>/s/ Namrata Kotwani</u>
5	Reichman Jorgensen	Rob Bonta
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15	Attorneys for Plaintiff-Intervenor Christopher Lipsey	
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20	Fax: (415) 433-7104 Email: egalvan@rbgg.com	
22	Attorneys for Plaintiffs	
23	IT IS SO ORDERED.	
24	Dated: February 24, 2022.	
25		INA man
26	ō	HIEF UNITED STATES DISTRICT JUDGE
27		
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