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 Christopher Lipsey*

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	
25	GAVIN NEWSOM, et al.,
26	Defendants.

Case No. 2:90-cv-00520 KJM-DB (PC)
STIPULATION AND ORDER
 Judge: The Hon. Kimberly J. Mueller

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 *Daubert* 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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IT IS SO STIPULATED.

Dated: February 16, 2022

Respectfully submitted,

/s/ Brian Baran

/s/ Namrata Kotwani

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IT IS SO ORDERED.

Dated: February 24, 2022.



CHIEF UNITED STATES DISTRICT JUDGE