

1 DONALD SPECTER – 083925
 STEVEN FAMA – 099641
 2 MARGOT MENDELSON – 268583
 PRISON LAW OFFICE
 3 1917 Fifth Street
 Berkeley, California 94710-1916
 4 Telephone: (510) 280-2621

5 CLAUDIA CENTER – 158255
 DISABILITY RIGHTS EDUCATION
 6 AND DEFENSE FUND, INC.
 Ed Roberts Campus
 7 3075 Adeline Street, Suite 210
 Berkeley, California 94703-2578
 8 Telephone: (510) 644-2555

MICHAEL W. BIEN – 096891
 ERNEST GALVAN – 196065
 LISA ELLS – 243657
 THOMAS NOLAN – 169692
 JENNY S. YELIN – 273601
 MICHAEL S. NUNEZ – 280535
 JESSICA WINTER – 294237
 AMY XU – 330707
 CARA E. TRAPANI – 313411
 MARC J. SHINN-KRANTZ – 312968
 ALEXANDER GOURSE – 321631
 GINGER JACKSON-GLEICH – 324454
 BRENDA MUÑOZ – 328813
 ARIELLE W. TOLMAN – 342635
 ROSEN BIEN
 GALVAN & GRUNFELD LLP
 101 Mission Street, Sixth Floor
 San Francisco, California 94105-1738
 Telephone: (415) 433-6830

11 Attorneys for Plaintiffs

12 UNITED STATES DISTRICT COURT
 13 EASTERN DISTRICT OF CALIFORNIA

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

Case No. 2:90-CV-00520-KJM-DB

**STIPULATION AND ORDER
 EXTENDING DEADLINES IN
 DECEMBER 29, 2022 ORDER RE:
 SECOND GOLDING REPORT**

Judge: Hon. Kimberly J. Mueller

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[4210079.4]

1 The Court’s December 29, 2022 Order set deadlines for Plaintiffs to file a motion
2 regarding the second report submitted by Dr. Michael Golding (“Second Golding Report”),
3 for Plaintiffs to notify Defendants of their intention to file any such motion, and for
4 Defendants to file a motion to seal some or all portions of the report. ECF No. 7690 at 3-4.

5 Plaintiffs approached Defendants regarding the schedule, and requested their
6 consent to a 14-day extension of the deadlines in the December 29 Order, given that
7 several members of Plaintiffs’ counsel have been or will be largely unavailable during the
8 30 day period prior to the motion deadline due to the winter holidays and the Special
9 Master’s monitoring tours of SVSP PIP, CHCF PIP, and CMF PIP the week of January 9,
10 2023. The parties are also actively preparing for several other deadlines in the case,
11 including their responses to the Special Master’s December 15, 2022 report regarding a
12 Final Proposed Telepsychiatry Policy (due January 17, 2023), meeting and conferring
13 regarding Defendants’ 2021 Annual Suicide Report by January 15, 2023, preparing a
14 schedule for compliance with the Court’s orders regarding Lindsay Hayes’ suicide
15 prevention recommendations, and meeting and conferring regarding Defendants’ plans for
16 the PIPs . *See* ECF No. 7682; Order, Dec. 15, 2022, ECF No. 7681 at 11; ECF No. 7696;
17 ECF No. 7607. A brief extension would allow the parties to meet and confer regarding
18 their respective positions on any relief Plaintiffs seek related to the Second Golding Report
19 as well as the sealing and privilege issues Defendants have raised.

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[4210079.4]

1 The parties therefore request that the Court extend by 14 days all deadlines in the
2 December 29 Order: Plaintiffs would be required to notify Defendants if they intend to
3 file a motion by January 26, 2023, and the parties' motions would be due February 9,
4 2023.

5 Respectfully submitted,

6 DATED: January 6, 2023

ROSEN BIEN GALVAN & GRUNFELD LLP

7 By: /s/ Jenny S. Yelin
8 Jenny S. Yelin

9 Attorneys for Plaintiffs

10
11 DATED: January 6, 2023

ROB BONTA
Attorney General of California
Deputy Attorney General

13 By: /s/ Elise Owens Thorn
14 Elise Owens Thorn
15 Deputy Attorney General

16 Attorneys for Defendants

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18 **ORDER**

19 Pursuant to the parties' stipulation, the deadlines in the December 29, 2022 Order
20 (ECF No. 7690) regarding the Second Golding Report are extended by 14 days: Plaintiffs
21 shall notify Defendants whether they intend to file a motion for relief related to the Second
22 Golding Report no later than January 26, 2023, and the parties motions, if any, shall be
23 filed no later than February 9, 2023.

24 **IT IS SO ORDERED.**

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26 DATED: January 11, 2023.

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28 CHIEF UNITED STATES DISTRICT JUDGE