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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  
EXTENDING TIME FOR JOINT  
MOTION AND STIPULATION PER  
ECF NO. 8181**

Judge: Hon. Kimberly J. Mueller

1 On April 2, 2024, the Court ordered the parties to file a joint motion to clarify the  
2 Court’s February 7, 2022, ECF No. 7456, as to “defendants’ obligation to inform the court  
3 to the extent [the new RHU] regulations may replace certain chapters of the Program  
4 Guide, a primary remedial plan in this action,” accompanied by a stipulation regarding the  
5 substantive portions of the RHU regulations and a recitation of the Special Master’s  
6 position. ECF No. 8181 at 6.

7 While the parties have identified significant areas of agreement in the negotiations  
8 to date, they have not exhausted their meet and confer process regarding the substantive  
9 provisions of Defendants’ new RHU initiative, which includes the RHU regulations and a  
10 RHU mental health policy. The parties wish to continue meeting and conferring to see  
11 whether they can come to agreement about the few remaining areas of dispute regarding  
12 the RHU initiative, which remain pending after their prior negotiations, and to discuss their  
13 respective positions regarding the impact of the February 7, 2022 Order on Defendants’  
14 obligations to move forward with the regulations and policy.

15 Unfortunately, the parties will not be able to complete this meet and confer process  
16 in time to present the joint motion by April 15, 2024, as ordered. ECF No. 8181 at 7. The  
17 three members of Plaintiffs’ team who are responsible for the joint motion are each on pre-  
18 planned vacations for part or all of the week of April 8-12, 2024, and the member of  
19 Plaintiffs’ team who has led the months-long negotiations regarding the RHU initiative is  
20 also unavailable that week due to an *Armstrong v. Newsom* monitoring tour. While  
21 Plaintiffs proposed meeting on April 3, 4, or 5, defense counsel were not available on those  
22 dates.

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1 The parties therefore respectfully request a ten-day extension of time until April 25,  
2 2024 to complete the negotiations, and to prepare and file the joint motion and stipulation.  
3 The parties recognize and appreciate the Court’s goal of resolving the joint motion “before  
4 the end of April 2024,” ECF No. 8181 at 6, but believe they can narrow the dispute and  
5 present a more cogent motion if they can first exhaust the meet and confer process.

6  
7 DATED: April 5, 2024 ROSEN BIEN GALVAN & GRUNFELD LLP

8  
9 By: /s/ Jenny S. Yelin  
10 Jenny S. Yelin

11 Attorneys for Plaintiffs

12 DATED: April 5, 2024 HANSON BRIDGETT LLP

13  
14 By: /s/ Paul Mello  
15 Paul Mello

16 Attorneys for Defendants

17  
18 DATED: April 5, 2024 ROB BONTA, ATTORNEY GENERAL OF CALIFORNIA

19  
20 By: /s/ Elise Thorn  
21 Elise Thorn

22 Attorneys for Defendants  
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**ORDER**

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The parties are granted an extension to April 25, 2024 to file the joint motion and stipulation that is required by the Court’s April 2, 2024 Order, ECF No. 8181.

IT IS SO ORDERED.

DATED: April 11, 2024.

  
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CHIEF UNITED STATES DISTRICT JUDGE