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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

ROBERT HECKER, et al.,

Plaintiffs,

v.

CALIFORNIA DEPARTMENT OF  
CORRECTIONS AND REHABILITATION,  
et al.,

Defendants.

Case No. 2:05-CV-02441 KJM-DAD

**STIPULATION AND PROPOSED  
ORDER FOR VOLUNTARY  
DISMISSAL OF CERTAIN  
INDIVIDUAL PLAINTIFFS**

Judge: Hon. Kimberly J. Mueller

1 On December 22, 2014, the Court issued an Order requiring Plaintiffs to either  
2 request voluntary dismissal of certain named Plaintiffs who are no longer incarcerated in  
3 CDCR prisons, or show cause why said plaintiffs should not be dismissed from this action.

4 Through this stipulation, the parties hereby agree that the following named  
5 Plaintiffs in this action are no longer incarcerated in CDCR prisons and can be voluntarily  
6 dismissed prior to the certification of the class and final approval of the settlement in this  
7 action:

- 8 • Robert Hecker, K04250
- 9 • Christopher Lee Jenkins, P73828
- 10 • Ying Watt, P85632
- 11 • Daniel Hunley, E83298
- 12 • Michael Lovelace, C23362
- 13 • Samuel D'Angelo, Jr., V63170
- 14 • Jon Schooley, T99324
- 15 • Eddie Thomas, E87750
- 16 • Peter Taylor, T19666
- 17 • Joseph Cox, V07060

18 The following named Plaintiffs are currently in CDCR custody as of the date of this  
19 filing and thus should not be voluntarily dismissed:

- 20 • Askia Ashanti (a.k.a. Lorenzo Cunningham), D98935
- 21 • John Wesley Williams, V34099
- 22 • John Mueller, AP3963
- 23 • Brian Stafford, E97271
- 24 • Bobby Daniels, P26216
- 25 • Quinton Gray, AP1590
- 26 • Ronald Auld, V41213

1 DATED: January 15, 2015

Respectfully submitted,

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ROSEN BIEN GALVAN & GRUNFELD LLP

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By: /s/ Michael W. Bien

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Michael W. Bien

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Attorneys for Plaintiffs

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7 DATED: January 15, 2015

KAMALA D. HARRIS

Attorney General of California

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By: /s/ Jay C. Russell

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Jay C. Russell

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Supervising Deputy Attorney General

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The parties have stipulated that named Plaintiffs Robert Hecker, K04250, Christopher Lee Jenkins, P73828, Ying Watt, P85632, Daniel Hunley, E83298, Michael Lovelace, C23362, Samuel D'Angelo, Jr., V63170, Jon Schooley, T99324, Eddie Thomas, E87750, Peter Taylor, T19666, and Joseph Cox, V07060 are no longer incarcerated in CDCR prisons and should be voluntarily dismissed.

The Court hereby dismisses the claims of plaintiffs Hecker, Jenkins, Watt, Hunley, Lovelace, D'Angelo Jr., Schooley, Thomas, Taylor and Cox without prejudice.

DATED: January 16, 2015

  
UNITED STATES DISTRICT JUDGE