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29 Attorneys for Plaintiffs

30 UNITED STATES DISTRICT COURT
31 EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

32 ROBERT HECKER, et al.,
33 Plaintiffs,
34 v.
35 CALIFORNIA DEPARTMENT OF
36 CORRECTIONS AND REHABILITATION,
37 et al.,
38 Defendants.

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

40 **STIPULATION AND PROPOSED
41 ORDER FOR VOLUNTARY
42 DISMISSAL OF CERTAIN
43 INDIVIDUAL PLAINTIFFS**

44 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,

2 ROSEN BIEN GALVAN & GRUNFELD LLP

3 By: /s/ Michael W. Bien

4 Michael W. Bien

5 Attorneys for Plaintiffs

6

7 DATED: January 15, 2015

KAMALA D. HARRIS
8 Attorney General of California

9 By: /s/ Jay C. Russell

10 Jay C. Russell

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12 Attorneys for Defendants

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PROPOSED ORDER

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

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

9 | DATED: January 16, 2015


John Muller
UNITED STATES DISTRICT JUDGE