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 11 Attorneys for Plaintiffs
 YVETTE DANIELS, MARIA AGUILAR
 12 and KAREN CURRIE

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 14 UNITED STATES DISTRICT COURT
 15 EASTERN DISTRICT OF CALIFORNIA

17 YVETTE DANIELS, MARIA AGUILAR) AND KAREN CURRIE, individually and on) 18 behalf of all persons similarly situated,) Plaintiffs,) v.) 20 CALIFORNIA DEPARTMENT OF) 21 CORRECTIONS AND REHABILITATION,) Defendant.) _____)	NO. 2:10-CV-00003-MCE-DAD STIPULATION AND [PROPOSED] ORDER TO ENLARGE PRETRIAL SCHEDULING ORDER <hr/> HON. MORRISON C. ENGLAND
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 24 Per the Stipulation and Order to Enlarge Pretrial Scheduling Order filed on
 25 February 13, 2011, all discovery for class certification is to be completed by May 18, 2011.
 26 Plaintiffs have served a number of discovery requests, including Request for Production of
 27 Documents and Special Interrogatories. Plaintiffs have also noticed two Persons Most
 28 Knowledgeable (hereinafter "PMK") depositions for April 26th and April 27th. Due to Ms.
 Talley's trial schedule these depositions did not go forward.

1 Ms. Daniels' deposition was taken on February 10, 2011 and May 17, 2011. Ms.
2 Currie's deposition was taken on February 17, 2011. Ms. Aguilar's deposition was noticed for
3 May 13, 2011, but did not go forward due to the unavailability of counsel and Ms. Aguilar.
4 The parties are working to reschedule Ms. Aguilar's deposition as soon as possible.

5 Defendant CDCR served Plaintiffs with Request for Production of Documents on
6 March 2, 2011. Plaintiffs produced documents in response to Defendant CDCR's Request for
7 Production of Documents on April 11, 2011. There are some outstanding issues regarding
8 Plaintiffs' responses, which the parties hope to resolve.

9 Good cause exists for this Stipulation because both parties are desirous of completing
10 the discovery in the case, which is critical to the fair administration of justice and essential to
11 the fact-finding process. Plaintiffs have served two sets of Special Interrogatories, two sets of
12 Request for Production of Documents and two PMK Deposition Notices. Defendant CDCR
13 has objected to all of Plaintiffs' Special Interrogatories, Requests for Production of Documents
14 and PMK Deposition Notices. The parties have met and conferred and resolved some of the
15 issues raised by CDCR, including all objections to the PMK Deposition Notices. Despite the
16 parties' best efforts there still remains unresolved issues relating to Plaintiffs' Special
17 Interrogatories and Request for Production of Documents. Plaintiffs have noticed a Motion to
18 Compel with Magistrate Judge Drozd for June 24, 2011 (Doc. # 19). The parties hope to have
19 these issues resolved expeditiously so Plaintiffs can move forward with their Class
20 Certification Motion.

21 Defendant CDCR has agreed to produce two witnesses and will produce policies and
22 procedures related to the public and open display of sexually explicit at adult inmate
23 institutions and the possession and display of sexually explicit materials at juvenile institutions.
24 The parties are working on scheduling those depositions as soon as possible.

25 Due to the outstanding depositions that need to be taken, and the pending discovery
26 hearing regarding Defendant CDCR's responses to Plaintiffs' discovery requests, counsel for
27 both parties are agreeable to moving the discovery cut-off, and the Class Certification Hearing,
28 and propose to modify the current Pretrial Scheduling Order as follows:

EVENT	CURRENT DATE	PROPOSED DATE
Class Certification Discovery Cut-Off:	May 18, 2011	September 30, 2011
Class Certification Hearing	July 20, 2011	November 17, 2011

Dated: May 20, 2011

PRICE AND ASSOCIATES

/s/ Jeshawna R. Harrell
JESHAWNA R. HARRELL, Attorney for Plaintiffs

Dated: May 20, 2011


CALIFORNIA DEPARTMENT OF JUSTICE
DEPUTY ATTORNEY GENERAL

/s/ Jill H. Talley
JILL H. TALLEY, Attorney for Defendant

ORDER

Pursuant to the foregoing stipulation of the parties and good cause appearing therefore,
IT IS HEREBY ORDERED that Class Certification Discovery Cut-Off dated May 18, 2011 shall be
moved to September 30, 2011, and the Class Certification Hearing shall be continued to November 17,
2011, at 2:00 p.m. in Courtroom 7.

Dated: May 27, 2011


MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE