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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DERRICK CLARK, et al.,

Plaintiffs,

v.

STATE OF CALIFORNIA, et al.,

Defendants.

C 96-1486 CRB

**STIPULATION REGARDING
PLAINTIFFS' COUNSEL'S
PARTICIPATION IN DEFENDANTS'
STRIKE TEAMS; ~~PROPOSED~~ ORDER**

Judge The Honorable Charles R.
 Breyer
Action Filed: April 22, 1996

The parties stipulate that:

1. On September 16, 2010, this Court issued its Findings of Facts and Conclusions of Law denying Defendants' Motion to Terminate the Settlement Agreement. (Doc. 500.)
2. Since that date, the parties have conferred about steps to address the issues identified by the Court in its Findings of Fact and Conclusions of Law.
3. Defendants have developed "strike teams" composed of CDCR staff and administrators to travel to the various institutions housing inmates in the Developmental Disability Program to improve compliance with the *Clark* Remedial Plan and this Court's orders.

1 4. Plaintiffs' counsel will be participating as part of the "strike team" concept at these
2 institutions.

3 5. The parties agree that they will not use any information learned or evidence gathered
4 during these "strike team" visits for any litigation purpose. The parties further agree that such
5 information or evidence shall be deemed inadmissible under Federal Rule of Evidence 408.

6 6. This stipulation does not bind Defendants to implement or maintain the "strike teams,"
7 or their current composition.

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10 Dated: 7/19/2011

/s/ Sara Norman
Sara Norman, Esq.
Prison Law Office
Counsel for Plaintiffs

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14 Dated: 7/19/2011

/s/ Jose A. Zelidon-Zepeda
Jose A. Zelidon-Zepeda
California Attorney General's Office
Counsel for Defendants

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17 Per the parties' stipulation, IT IS SO ORDERED.

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19 Dated: July 22, 2011

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