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

DAVID OSTER, *et al.*,

Plaintiffs,

v.

WILL LIGHTBOURNE, Director of the California
 Department of Social Services; TOBY DOUGLAS,
 Director of the California Department of Health Care
 Services; CALIFORNIA DEPARTMENT OF HEALTH
 CARE SERVICES; and CALIFORNIA DEPARTMENT
 OF SOCIAL SERVICES,

Defendants.

Case No. CV 09-04668 CW

**JOINT STATUS REPORT,
 STIPULATION, AND
~~PROPOSED~~ ORDER SETTING
 BRIEFING AND HEARING
 SCHEDULE FOR PRELIMINARY
 APPROVAL OF CLASS ACTION
 SETTLEMENT**

1 Pursuant to this Court's Order of March 20, 2013, the parties, by and through their
2 counsel, hereby submit the following joint status report and stipulation setting a proposed
3 briefing and hearing schedule for Plaintiffs' anticipated motion for preliminary approval of
4 class action settlement, and request that the Court so order.

5 **JOINT STATUS REPORT**

6 On March 13, 2013, the parties reached agreement on a term sheet outlining a
7 proposed settlement of the above-captioned class action lawsuit. That term sheet requires
8 that the parties memorialize the terms of the settlement in a written settlement agreement.
9 The parties have been engaged in continuous negotiations for the past 10 days regarding the
10 settlement agreement. They reached final agreement on the settlement agreement this
11 morning and are obtaining final signatures approving the terms. Plaintiffs intend to file a
12 motion for preliminary approval of the class settlement tomorrow, on March 28, 2013.

13 The settlement is dependent on specified budget solutions, some of which must be
14 implemented no later than July 1, 2013, with approximately 30 days lead time necessary to
15 implement the budget solutions. Accordingly, time is of the essence. The parties therefore
16 respectfully request that the Court order an expedited briefing and hearing schedule on
17 Plaintiffs' Motion for Preliminary Approval, so that notice of the pending settlement may
18 issue forthwith and the Court has time to consider and rule upon final approval by mid-May.

19 **STIPULATED BRIEFING AND HEARING SCHEDULE**

20 IT IS HEREBY STIPULATED between the parties through their respective counsel
21 that, subject to Court approval:

- 22 1. Plaintiffs will file their motion for Preliminary Approval of Class Action
23 Settlement no later than March 28, 2013.
- 24 2. The hearing on Plaintiffs' Motion for Preliminary Approval of Class Action
25 Settlement shall take place on Thursday, April 4, at 2:00 p.m.

26 Dated: March 27, 2013

27 Respectfully Submitted,

28 /s/ Melinda Bird

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18 *Dottie Jones, Andrea Hylton, Helen Polly*
19 *Stern, Charles Thurman, L.C., and the Plaintiff*
20 *Class*

21 /s/ Eve Cervantez
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State Council, UDW, and CUHW*

24 Dated: March 27, 2013

Respectfully Submitted,

25 /s/ Susan M. Carson
26 KAMALA HARRIS
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28 SUSAN M. CARSON
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GENERAL ORDER 45 ATTESTATION


I, Melinda Bird, am the ECF user whose ID and password are being used to file this stipulation. In compliance with General Order 45, X.B, I hereby attest under the penalty of perjury that concurrence regarding filing this document has been obtained from each of its signatories.

Dated: March 27, 2013

/s/ Melinda Bird
Melinda Bird

GOOD CAUSE APPEARING, PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 3/28/2013


Hon. Claudia Wilken
United States District Judge