

1 KAMALA D. HARRIS  
 Attorney General of California  
 2 JAY C. RUSSELL  
 Supervising Deputy Attorney General  
 3 CHRISTOPHER H. FINDLEY, State Bar No. 174972  
 CHRISTINE M. CICCOTTI, State Bar No. 238695  
 4 Deputy Attorneys General  
 1300 I Street, Suite 125  
 5 P.O. Box 944255  
 Sacramento, CA 94244-2550  
 6 Telephone: (916) 323-4025  
 Fax: (916) 324-5205  
 7 E-mail: Christine.Ciccotti@doj.ca.gov  
 Attorneys for Defendants Governor Brown,  
 8 Secretary Kernan, and Warden Davis

9 IN THE UNITED STATES DISTRICT COURT  
 10 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 11 OAKLAND DIVISION

13 **BOBBY LOPEZ, et al.,**

14 Plaintiffs,

15 v.

17 **EDMUND G. BROWN, et al.,**

18 Defendants.

4:15-cv-02725-CW NJV

**STIPULATION AND ~~PROPOSED~~—  
 ORDER TO VACATE AND RE-SET  
 STATUS CONFERENCE**

Judge: The Honorable Claudia Wilken  
 Action Filed: 6/17/2015

19  
 20 On March 15, 2016, the parties appeared telephonically before Magistrate Judge Nandor J.  
 21 Vadas for a status conference in this matter. At the status conference, the parties reported on their  
 22 progress in settlement negotiations. As a result, this Court set a further status conference for  
 23 April 26, 2016, at which the parties were to continue to report on their progress. This Court also  
 24 ordered the parties to submit a joint status update no later than one week before the conference, in  
 25 which the parties could identify any impediments towards settlement.

26 The parties met on April 11, 2016 and intend to continue their negotiations. The April 11  
 27 meeting was fruitful in that it allowed the parties to clarify barriers to settlement. Defendants  
 28 agreed to take the revisions Plaintiffs' proposed at that meeting into consideration, and intend to

1 respond. As such, the parties agreed at the meeting that additional time was necessary for them to  
2 continue that work and that there would be little to report to the court before a subsequent  
3 meeting between the parties, which they are scheduling. As such, the parties stipulate and  
4 respectfully request the Court vacate the April 26, 2016 status conference and the order to submit  
5 a status conference statement by April 19, 2016. The parties stipulate and request the Court re-set  
6 the telephonic status conference in this matter for June 7, 2016 at 2:00 p.m., with a joint status  
7 report due no later than May 31, 2016.

8 Dated: April 19, 2016

Respectfully Submitted,

9 KAMALA D. HARRIS  
10 Attorney General of California  
11 JAY C. RUSSELL  
Supervising Deputy Attorney General

12 */s/ Christine M. Ciccotti*  
13 CHRISTINE M. CICCOTTI  
14 Deputy Attorney General  
Attorneys for Defendants Governor Brown,  
Secretary Kernan, and Warden Davis

15  
16 Dated: April 19, 2016

SIEGEL & YEE

17  
18 */s/ EmilyRose Johns*  
EMILYROSE JOHNS  
19 Attorney for Plaintiffs

20 Under N.D. Cal. Local Rule 5-1(i)(3), I attest that I obtained concurrence in the filing of this  
21 document from E. Johns on April 18, 2016.

22 Dated: April 19, 2016

23 */s/ Christine M. Ciccotti*  
24 CHRISTINE M. CICCOTTI  
25 Deputy Attorney General  
Attorney for Defendants Governor Brown,  
Secretary Kernan, and Warden Davis

26 SA2015104183  
27 12226815.doc

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**[PROPOSED] ORDER**

The parties have stipulated to vacate the April 26, 2016 status conference and associated deadlines for submitting joint status reports and reset the status conference for June 7, 2016. Given the foregoing stipulation, and good cause appearing, IT IS SO ORDERED. This matter is set for a telephonic status conference at <sup>1:00</sup>~~2:00~~ on June 7, 2016.

Dated: April 21, 2016



The Honorable Nandor J. Vadas  
United States District Court Magistrate Judge