ROB BONTA, State Bar No. 202668
Attorney General of California
PREETI K. BAJWA, State Bar No. 232484
Supervising Deputy Attorney General
JOHN W. FAULCONER, State Bar No. 298015
Deputy Attorney General
455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004
Telephone: (415) 510-4481
Fax: (415) 703-5480
E-mail: John.Faulconer@doj.ca.gov
Attorneys for the California Department of Corrections and Rehabilitation and Special Appearance for R. St. Andre

BRYAN J. Harrison, ESQ. (SBN 277312)
Bryan@h-klaw.com
EDI P. KRISTOPHER, ESQ.
(SBN 284883)
Edi@h-klaw.com
HARRISON KRISTOPHER, LLP
301 E. Colorado Blvd, Ste. 323
Pasadena, California 91101
Telephone: (866) 529-6155
Facsimile: (866) 565-6206

HOSSEIN KHATAMI, ESQ.
(SBN 278350)
Hoss@hosslaw.com
HOSS LAW, P.C.
2140 Professional Dr., Ste. 150
Roseville, California 95611
Telephone: (916) 788-4445
Facsimile: (916) 788-4447

Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

SACRAMENTO DIVISION

THE ESTATE OF JOSEPH REAGAN, by and through Chelsea August, Successor in Interest to Decedent Joseph Reagan; CHELSEA AUGUST as an individual, Plaintiffs, **v.** **CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, et al.,** Defendants.	2:25-cv-03429-JAM-CKD **STIPULATION AND ORDER TO CONTINUE RESPONSIVE PLEADING DEADLINE** Judge: The Honorable John A. Mendez / The Honorable Carolyn K. Delaney Action Filed: November 26, 2025

Plaintiffs THE ESTATE OF JOSEPH REAGAN, by and through Chelsea August, Successor in Interest to Decedent Joseph Reagan; CHELSEA AUGUST, as an Individiual and

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

her Counsel, and the undersigned Defense counsel, who represents the California Department of Corrections and Rehabilition (CDCR) and is making a special appearance on behalf of R.St. Andre for the limited purpose of this stipulation, submit this stipulation to continue the deadline to respond to Plaintiffs' Complaint for Violations of Civil and Constitutional Rights, and Demand for Jury Trial (ECF No. 1), until January 30, 2026.

STIPULATION

IT IS HEREBY STIPULATED AND AGREED as follows:

1. Defendants' current deadline to file a responsive pleading is December 24, 2025.
2. Defense counsel, who is employed by the California Office of the Attorney General, was recently assigned to the case and requires more time to confirm representation of R. St. Andre and review the operative complaint to prepare a responsive pleading.
3. Defense counsel contacted Plaintiffs' counsel requesting a stipulated extension of time to file a responsive pleading. The parties agreed to file this stipulation requesting a deadline to file a responsive pleading by January 30, 2026.
4. This is the first request for an extension of time to file a responsive pleading in this matter.

IT IS SO STIPULATED

Dated: December 17, 2025

Respectfully submitted,

ROB BONTA
Attorney General of California
PREETI K. BAJWA
Supervising Deputy Attorney General

/s/ John Faulconer
JOHN W. FAULCONER
Deputy Attorney General
for the California Department of Corrections and Rehabilitation and Special Appearance for Robert St. Andre

Dated: December 18, 2025

/s/ Bryan Harrison
BRYAN J. Harrison, ESQ. (SBN 277312)
HARRISON KRISTOPHER, LLP
Attorneys for Plaintiffs

ATTESTATION

I, John Faulconer, am the ECF user whose user ID and password authorized the filing of this document. I attest that all signatories to this document have concurred in this filing.

Dated

/s/ John Faulconer
John Faulconer

ORDER

PURSUANT TO STIPULATION AND FOR GOOD CAUSE SHOWN, IT IS HEREBY ORDERED:

The responsive pleading deadline is hereby **EXTENDED** to **January 30, 2026**.

Dated: December 31, 2025

JOHN A. MENDEZ,
SENIOR UNITED STATES DISTRICT JUDGE