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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 STAY DISCOVERY PENDING RESOLUTION OF DEFENDANTS' MOTION TO DISMISS

Judge: The Honorable John A. Mendez / The Honorable Carolyn K. Delaney
Action Filed: November 26, 2025

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

Plaintiffs THE ESTATE OF JOSEPH REAGAN, by and through Chelsea August, Successor in Interest to Decedent Joseph Reagan; CHELSEA AUGUST, as an Individiual and her Counsel, and Defendants California Department of Corrections and Rehabilition (CDCR) and R.St. Andre submit this stipulation to stay discovery pending resolution of Defendants' motion to dismiss Plaintiffs' complaint, which will be filed concurrently as to this stipulation. The parties request discovery be stayed and once an order issues regarding Defendants' motion that the Court set a scheduling conference to occur within 30 days, or as soon as practical for the Court thereafter.

STIPULATION

IT IS HEREBY STIPULATED AND AGREED as follows:

1. Defendants have not filed a responsive pleading in this matter and discovery has not yet opened.
2. Defendants are concurrently filing a motion to dismiss.
3. The parties agree that discovery be stayed pending resolution of Defendants' motion.
4. The parties request that once an order issues regarding Defendants' motion that the Court set a scheduling conference to occur within 30 days, or as soon as practical for the Court thereafter.

IT IS SO STIPULATED

Dated: January 30, 2026

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 R. St. Andre

Dated: January 30, 2026

/s/ Bryan Harrison
BRYAN J. Harrison, ESQ. (SBN 277312)
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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:

Discovery is **STAYED** pending resolution of Defendants' motion to dismiss. The Court will set a scheduling conference to occur **within 30 days** of issuance of an order regarding Defendants' motion, or as soon as practical for the Court thereafter.

Dated: February 02, 2026

JOHN A. MENDEZ,
SENIOR UNITED STATES DISTRICT JUDGE