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IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

WALTER PEDERSEN, et al.,

Plaintiffs,

vs.

COUNTY OF PLUMAS, et al.,

Defendants.

Case No. 2:89-CV-01659-CSK

JOINT STIPULATION TO TERMINATION OF CONSENT DECREE

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

For the reasons set forth herein and pursuant to Paragraph XII.A of the Consent Decree that was entered in this action on April 20, 1992, the Plaintiffs and Defendants hereby file a Joint Stipulation to Termination of Consent Decree and request that the Court approve such termination by endorsing this stipulation below pursuant to Local Rule 143(b).

The Consent Decree was negotiated by the parties and was entered by the Court to resolve alleged violations of the First, Fourth, Eighth, and Fourteenth Amendments of the United States Constitution and of the Laws of the United States by Defendants at the Plumas County Correctional Center (the "Jail"). While, upon Plaintiff's counsel's April 23, 2026 visit to Plumas County Jail, certain commitments by Defendants have not yet been fully realized, Plaintiffs trust and expect that the following commitments will be realized by Defendants within the next 60 days: (1) that a barrier will be placed in the exercise commode area to provide inmates with privacy from other inmates, guards, and cameras while using same; (2) that some alternative to basketball will be given to the inmates by posters demonstrating ways to exercise and hopscotch painted on the floor; (3) that exercise mats will be available for inmates to use upon request; (4) that recreation will consistently occur between the hours of 10:00 a.m. and 3:00 p.m. five days per week; (5) that effective measures will be taken to keep the pull-up bars out of the rain without excessive obstruction of airflow or sunlight; and (6) that exercise equipment will be stored indoors when not in use so as to avoid damage caused by the elements. As a result of same and consistent with said expectations, the parties now agree that, in the thirty-two years since the Consent Decree was entered by the Court, the Plumas County has substantially complied with the Consent Decree. Accordingly, the parties agree that the Consent Decree may now be terminated and Defendants agree to pay Plaintiff's counsel $10,000 for their work on this matter from January 1 through the filing of this stipulation, thus resolving their financial obligations in this matter.

Paragraph XII.A of the Consent Decree states that the Consent Decree may be terminated only by this Court on duly noticed motion or by written stipulation of counsel. For the above reasons, the parties hereby submit for Court approval this Joint Stipulation to Termination of Consent Decree. Pursuant to Local Rule 143(a)(1), this Joint Stipulation is signed by all attorneys who have appeared in this action with the exception of Paul T. Persons, who is deceased.

IT IS SO STIPULATED.

Dated: April 14, 2026

HADSELL STORMER & RENICK LLP

By: /s/ David Clay Washington
Dan Stormer
David Clay Washington
Attorney for Plaintiffs

Dated: April 14, 2026

PAUL W. COMISKEY

By: /s/ Paul W. Comiskey
Paul W. Comiskey
Attorney for Plaintiffs

Dated: April 14, 2026

OFFICE OF THE COUNTY COUNSEL,
COUNTY OF PLUMAS

By: /s/ Joshua Brechtel
Joshua Brechtel
County Counsel
Attorney for Defendants

IT IS SO ORDERED.

Dated: May 1, 2026

CHI SOO KIM
UNITED STATES MAGISTRATE JUDGE
Eastern District of California

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