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28 IN THE UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF CALIFORNIA
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12 SACRAMENTO DIVISION

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15 **RALPH COLEMAN, et al.,**

16 Plaintiffs,

17 v.

18 **GAVIN NEWSOM, et al.,**

19 Defendants.

20 Case No. 2:90-cv-00520 KJM-DB (PC)

21
22 **STIPULATION AND ORDER TO
23 EXTEND TIME TO FILE STIPULATION
24 IDENTIFYING PROGRAM GUIDE
25 DEPARTURES**

26 On April 17, 2020, the Court ordered the parties to file by May 1, 2020 a stipulation
27 identifying the “temporary departures from certain Program Guide requirements” for the
28 provision of mental health care that Defendants had implemented in response to the COVID-19
pandemic. (ECF No. 6622 at 2-3.) The parties met and conferred in response to the Court’s April
17 order, and determined more time would be necessary to come to agreement on the content of
the stipulation. (ECF No. 6652 at 2.) Accordingly, the parties requested and the Court granted
the parties an extension until May 15, 2020 to file the stipulation. (*Id.* at 2, 3.)

1 Since the initial meet and confer, the parties have continued to negotiate, under the Special
2 Master's supervision, the content of the Court-ordered stipulation identifying COVID-19-based
3 departures from Program Guide requirements for mental health treatment and programming.
4 During this period, the parties have exchanged draft stipulations and discussed various provisions,
5 with the mutual goal of reaching a stipulation concerning this issue. Twice during the afternoon
6 of May 15, Defendants sent Plaintiffs a version of the draft stipulation, but for reasons unknown
7 to the parties, Plaintiffs did not receive that correspondence. The parties discovered this technical
8 issue after the close of business today and continued their negotiations on the limited remaining
9 points, but both sides determined that additional time is needed to reach an agreement.

10 The parties believe that, with a short extension of time, they will complete negotiations and
11 reach a stipulation identifying the temporary departures from certain Program Guide requirements
12 for the provision of mental health care that Defendants had implemented in response to the
13 COVID-19 pandemic. Accordingly, the parties request an extension of three business days from
14 the present due date, such that their stipulation would be due by Wednesday, May 20, 2020.

15 The Special Master is aware of and approves this stipulated request for additional time.

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1 Dated: May 15, 2020

XAVIER BECERRA
Attorney General of California
ADRIANO HRVATIN
Supervising Deputy Attorney General

7 Dated: May 15, 2020

ROSEN BIEN GALVAN & GRUNFELD LLP

8 /s/ Kyle A. Lewis
9 Kyle A. Lewis
10 Deputy Attorney General
11 *Attorneys for Defendants*

12 **IT IS SO ORDERED.**

13 DATED: May 18, 2020.

14 
15 CHIEF UNITED STATES DISTRICT JUDGE