

1 XAVIER BECERRA
2 Attorney General of California
3 MONICA N. ANDERSON
4 Senior Assistant Attorney General
5 ADRIANO HRVATIN
6 Supervising Deputy Attorney General
7 KYLE A. LEWIS, State Bar No. 201041
8 ELISE OWENS THORN, State Bar No. 145931
9 TYLER V. HEATH, State Bar No. 271478
10 LUCAS HENNES, State Bar No. 278361
11 Deputy Attorneys General
12 1300 I Street, Suite 125
13 P.O. Box 944255
14 Sacramento, CA 94244-2550
15 Telephone: (916) 210-7318
16 Fax: (916) 324-5205
17 E-mail: Elise.Thorn@doj.ca.gov
18 *Attorneys for Defendants*

19 ROMAN M. SILBERFELD, State Bar No. 62783
20 GLENN A. DANAS, State Bar No. 270317
21 ROBINS KAPLAN LLP
22 2049 Century Park East, Suite 3400
23 Los Angeles, CA 90067-3208
24 Telephone: (310) 552-0130
25 Fax: (310) 229-5800
26 E-mail: RSilberfeld@RobinsKaplan.com
27 *Special Counsel for Defendants*

28

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF CALIFORNIA
3 SACRAMENTO DIVISION

4

5 **RALPH COLEMAN, et al.,**

6 Plaintiffs,

7 **v.**

8

9 **GAVIN NEWSOM, et al.,**

10 Defendants.

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

12 **STIPULATION AND ORDER TO FILE
13 CDCR MAPS UNDER SEAL**

14

15 Judge: The Hon. Kimberly J. Mueller

16

17 On May 22, 2020, the Court ordered the parties to meet and confer and file by May 27,
18 2020 “a stipulated request concerning the filing of the maps and other documents” describing the
19 California Department of Corrections and Rehabilitation’s mental health programs at various
20 prison facilities, as impacted by the COVID-19 pandemic. Order, ECF No. 6681 at 1 (May 22,
21 2020). Defendants submitted the maps and other documents *in camera* on May 15, 2020. *Id.*
22 The Court specifically asked the parties to stipulate whether the maps should be filed under seal.
23 *Id.*

1 The parties met and conferred and agree that the submitted maps, and any revised versions
2 of the maps contemplated by the May 22, 2020 order, should be filed under seal. In addition to
3 the maps, Defendants submitted patient census, and level of care data and information *in camera*
4 to the Court on May 15, 2020. The parties agree that such data and information does not need to
5 be filed under seal.

6 The parties continue to meet and confer to consider “further refinements” to the maps and
7 other documents Defendants provided *in camera* on May 15, 2020. *Id.* at 1-2. The parties will
8 notify the Court if Defendants and/or Plaintiffs believe that any of those further refinements
9 require additional information to be filed under seal.

IT IS SO STIPULATED.

11 || Dated: May 27, 2020

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

17 || Dated: May 27, 2020

ROSEN BIEN GALVAN & GRUNFELD LLP

10

/s/ *Jessica Winter*
JESSICA WINTER
Attorneys for Plaintiffs

* * *

ORDER

At the further status conference on May 29, 2020, the parties clarified that both the general mental health services delivery map and the two page letter from Melissa Bentz that accompanied defendants' *in camera* submission may be filed on the public docket. With this clarification, the

1 stipulation is approved. Defendants shall forthwith submit to the Clerk of the Court to file and
2 maintain under seal, all of the institutional maps submitted by defendants on May 15, 2020 for *in*
3 *camera* review. In addition, defendants shall forthwith file on the public record all other
4 documents that accompanied that submission.

5 **IT IS SO ORDERED.**

6 DATED: June 9, 2020.

7 
8 CHIEF UNITED STATES DISTRICT JUDGE
9

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28