

XAVIER BECERRA
Attorney General of California
MONICA N. ANDERSON
Senior Assistant Attorney General
ADRIANO HRVATIN
Supervising Deputy Attorney General
KYLE A. LEWIS, State Bar No. 201041
ELISE OWENS THORN, State Bar No. 145931
TYLER V. HEATH, State Bar No. 271478
LUCAS HENNES, State Bar No. 278361
Deputy Attorneys General
1300 I Street, Suite 125
P.O. Box 944255
Sacramento, CA 94244-2550
Telephone: (916) 210-7318
Fax: (916) 324-5205
E-mail: Elise.Thorn@doj.ca.gov
Attorneys for Defendants

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

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

RALPH COLEMAN, et al.,

Plaintiffs,

v.

GAVIN NEWSOM, et al.,

Defendants.

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

**STIPULATION AND ORDER FOR
ADDITIONAL TIME TO RESPOND TO
THE JULY 17, 2020 MINUTE ORDER**

Judge: The Hon. Kimberly J. Mueller

On October 23, 2019, the Court ordered the parties to meet and confer regarding Plaintiffs' request for an order requiring Defendants to certify all data provided to this Court, the Special Master, and Plaintiffs, and to submit statements outlining their respective positions. (ECF No. 6365.) After meeting and conferring, the parties filed their statements on November 5, 2019. (ECF Nos. 6383, 6384.) In its December 17, 2019 order, the Court acknowledged that the parties "have now presented their individual views on proper approaches to such certification and that matter is submitted." (ECF No. 6427 at 47.)

1 On July 17, 2020, in response to discussion at the quarterly status conference held that
2 date, the Court directed the parties “to meet and confer concerning any need for supplemental
3 briefing on Plaintiffs’ data certification proposals that followed the proceedings on the Golding
4 Report” and to file any request for supplemental briefing within seven days. (ECF No. 6778.)

5 The parties met and conferred on July 22, 2020, and agree they require more time to
6 discuss the issue of data certification with the Special Master in light of the work pending by
7 Dr. Daniel Potter, the data expert appointed to advise the Special Master on mental health data-
8 related issues. (ECF Nos. 6604, 6646.) For example, on June 8, 2020, the Special Master filed a
9 report on the work done by his expert to date, and he requested an additional 90 days to file a
10 report setting forth Dr. Potter’s opinions on a number of data issues. (ECF No. 6705 at 18-21.)
11 Due to the potentially broad scope of data issues Dr. Potter intends to analyze, the parties request
12 an additional fourteen days—up to August 7, 2020—to confer with the Special Master and one
13 another to determine whether and to what extent Dr. Potter’s work and opinions will touch on the
14 issues of data integrity and certification. Also on August 7, 2020, the parties agree to file either a
15 stipulation indicating whether there is a need for additional briefing on the certification issue, or a
16 joint report setting forth the parties’ respective positions on the issue.

17 The Special Master has reviewed and approves this request.

18 IT IS SO STIPULATED.

19 ///

20 ///

1 Dated: July 24, 2020

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

2
3
4
5 /s/ Elise Owens Thorn
ELISE OWENS THORN
Deputy Attorney General
Attorneys for Defendants

6
7 Dated: July 24, 2020

ROSEN BIEN GALVAN & GRUNFELD LLP

8
9 /s/ Jessica Winter
JESSICA WINTER
Attorneys for Plaintiffs

10
11
12 **IT IS SO ORDERED.**

13 DATED: July 29, 2020.

14
15 
16 CHIEF UNITED STATES DISTRICT JUDGE
17
18
19
20
21
22
23
24
25
26
27
28