

1 PRISON LAW OFFICE
DONALD SPECTER Bar No.: 83925
2 STEVEN FAMA Bar No.: 99641
KEITH WATTLEY Bar No.: 203366
3 General Delivery
San Quentin, California 94964
4 Telephone (415) 457-9144

5 BINGHAM, McCUTCHEN, LLP
WARREN E. GEORGE Bar No.: 53588
6 Three Embarcadero Center
San Francisco, California 94111
7 Telephone (415) 393-2000

8 ROSEN, BIEN & ASARO, LLP
MICHAEL W. BIEN Bar No.: 096891
9 JANE E. KAHN Bar No.: 112239
THOMAS NOLAN Bar No.: 169692
10 155 Montgomery Street, 8th Floor
San Francisco, California 94104
11 Telephone (415) 433-6830

12 HELLER, EHRMAN, WHITE & McAULIFFE
RICHARD L. GOFF Bar No.: 36377
13 701 Fifth Avenue
Seattle, Washington 98104
14 Telephone (206) 447-0900

15 THE LEGAL AID SOCIETY-EMPLOYMENT LAW CENTER
CLAUDIA CENTER Bar No.: 158255
16 LEWIS BOSSING Bar No.: 227402
600 Harrison Street, Suite 120
17 San Francisco, CA 94107
Telephone: (415) 864-8848
18

19 Attorneys for Plaintiffs

20 UNITED STATES DISTRICT COURT
21 EASTERN DISTRICT OF CALIFORNIA

22 RALPH COLEMAN,

23 Plaintiffs,

24 vs.

25 ARNOLD SCHWARZENEGGER, et al.,

26 Defendants
27 _____

) No.: Civ S 90-0520 LKK-JFM
)

) **STIPULATION AND ORDER RE:**
) **BRIEFING SCHEDULE RE:**
) **PLAINTIFFS' NOTICE OF**
) **DEFENDANTS' FAILURE TO COMPLY**
) **WITH THE JUNE 9, 2005 COURT**
) **ORDER, PARAGRAPHS 2 AND 5, RE:**
) **SUICIDE PREVENTION POLICIES**

1 THE PARTIES, BY AND THROUGH THEIR COUNSEL, STIPULATE AS
2 FOLLOWS:

3 The parties, request that the Court modify the briefing schedule concerning Plaintiffs'
4 Notice of Defendants' Failure to Comply with the June 9, 2005 Court Order, Paragraphs 2 and
5 5, Re: Suicide Prevention Policies, as set forth below.

6 1. On August 26, 2005, Plaintiffs' Notice of Defendants' Failure to Comply with the
7 June 9, 2005 Court Order, Paragraphs 2 and 5, Re: Suicide Prevention Policies was filed.

8 2. On September 12, 2005, the Court set the matter for hearing on October 14,
9 2005, and set a briefing schedule. Defendants' response was to be filed within "15 days from the
10 date of this Order" and "Plaintiffs' reply, if any, was due ten days thereafter."

11 Defendants filed their amended responsive pleadings on or about September 15, 2005. Thus,
12 under the current briefing schedule, plaintiffs' reply is due on September 26, 2005.

13 3. On September 20, 2005, the Court, after consultation with the Special Master,
14 issued an Order continuing the hearing to October 27, 2005, at 10:00 a.m. The Order did not
15 alter the briefing schedule.

16 4. The parties have been in negotiation concerning defendants' compliance with the
17 June 9, 2005 Order and have also been consulting with the Special Master. To facilitate the
18 process, plaintiffs' counsel has requested, and defendants' counsel and the Special Master have
19 agreed, that plaintiffs be provided with additional time to file a reply. The parties and the
20 Special Master agree that plaintiffs' reply must be filed on or before September 30, 2005.

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

IT IS SO STIPULATED.

Dated: September 22, 2005

BILL LOCKYER Attorney General
of the State of California
JAMES M. HUMES Chief Assistant Attorney
General
FRANCES T. GRUNDER Senior Assistant
Attorney General
STEPHEN P. AQUISTO Supervising Deputy
Attorney General

By /signature on original
LISA A. TILLMAN
Deputy Attorney General,
Attorneys for Defendants

Dated: September 22, 2005

ROSEN, BIEN & ASARO, LLP

By /signature on original
JANE E. KAHN
Attorneys for Plaintiffs

Good cause appearing, IT IS HEREBY ORDERED that:

Plaintiffs time to reply shall be extended and plaintiffs' reply, if any, shall be filed
no later than September 30, 2005.

Dated: September 26, 2005

/s/Lawrence K. Karlton
LAWRENCE K. KARLTON
SENIOR JUDGE
UNITED STATES DISTRICT COURT