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10 IN THE UNITED STATES DISTRICT COURTS  
11 FOR THE EASTERN DISTRICT OF CALIFORNIA  
12 AND THE NORTHERN DISTRICT OF CALIFORNIA  
13 UNITED STATES DISTRICT COURT COMPOSED OF THREE JUDGES  
14 PURSUANT TO SECTION 2284, TITLE 28 UNITED STATES CODE

15 <b>RALPH COLEMAN, et al.,</b>	2:90-cv-00520 KJM DAD PC
16 v. 17 Plaintiffs,	<b><u>THREE-JUDGE COURT</u></b>
18 <b>EDMUND G. BROWN JR., et al.,</b>	
19 v. 20 Defendants.	
21 <b>MARCIANO PLATA, et al.,</b>	C01-1351 TEH
22 v. 23 Plaintiffs,	<b><u>THREE-JUDGE COURT</u></b>
24 <b>EDMUND G. BROWN JR., et al.,</b>	<b>STIPULATION AND [PROPOSED] ORDER IN RESPONSE TO NOVEMBER 14, 2014 ORDER</b>
25 v. 26 Defendants.	

## STIPULATION

In its November 14, 2014 Order, the Three-Judge Court ordered the parties to meet-and-confer regarding Plaintiffs' requests for Defendants to (1) expand 2-for-1 credits for minimum custody inmates who are ineligible for fire camps; and (2) expand credit earning from 20% to 33.3% for all non-violent second-strike offenders, including those with a prior sex offense.

The parties, with the assistance of the Compliance Officer, met and conferred and stipulate and agree to the following:

1. Starting January 1, 2015, Defendants shall expand 2-for-1 credits to all inmates designated as Minimum Custody A or Minimum Custody B pursuant to Cal. Code of Regs tit. 15, sec. 3377.1 who are currently eligible to earn day-for-day credits (50%). This new credit measure will be applied prospectively. This agreement will allow inmates to continue participating in fire camps, where they live and work outside the secure perimeter of prisons and can obtain valuable skills and training that will prepare them for reentry into society.

2. Plaintiffs withdraw their demand that CDCR expand 33.3% credit earnings to all non-violent second strike offenders, including those who have to register under Penal Code section 290.

3. The parties' agreement resolves all outstanding issues raised in Plaintiffs' Motion for Further Enforcement Order, filed September 16, 2014, that were the subject of the court-ordered meet-and-confer.

Dated: December 12, 2014

KAMALA D. HARRIS  
Attorney General of California

Dated: December 12, 2014

HANSON BRIDGETT LLP

By: /s/ *Paul B. Mello*

PAUL B. MELLO  
*Attorneys for Defendants*

1 Dated: December 12, 2014

PRISON LAW OFFICE

2 BY: */s/ Donald Specter (as authorized*  
3 *12/12/14)*

4 DONALD SPECTER  
Attorneys for Plaintiffs

5 Dated: December 12, 2014

ROSEN BIEN GALVAN & GRUNFELD LLP

6 BY: */s/ Michael W. Bien (as authorized*  
7 *12/12/14)*

8 MICHAEL W. BIEN  
9 Attorneys for Plaintiffs

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1 **[PROPOSED] ORDER**

2 Pursuant to the foregoing stipulation, IT IS SO ORDERED.

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4 Dated: 12/19/14

  
5 STEPHEN REINHARDT  
6 UNITED STATES CIRCUIT JUDGE  
7 NINTH CIRCUIT COURT OF APPEALS

8 Dated: 12/19/14

  
9 THELTON E. HENDERSON  
10 SENIOR UNITED STATES DISTRICT JUDGE  
11 NORTHERN DISTRICT OF CALIFORNIA

12 Dated: 12/19/14

  
13 KIMBERLY J. MUELLER  
14 UNITED STATES DISTRICT JUDGE  
15 EASTERN DISTRICT OF CALIFORNIA