

1 BILL LOCKYER
2 Attorney General of the State of California
3 JAMES M. HUMES
4 Chief Assistant Attorney General
5 FRANCES T. GRUNDER
6 Senior Assistant Attorney General
7 ROCHELLE C. EAST
8 Supervising Deputy Attorney General
9 LISA A. TILLMAN, State Bar No. 126424
10 Deputy Attorney General
11 1300 I Street, Suite 125
12 P.O. Box 944255
13 Sacramento, CA 94244-2550
14 Telephone: (916) 327-7872
15 Fax: (916) 324-5205
16
17 Attorneys for Defendants
18 CF1997CS0003

19
20
21 IN THE UNITED STATES DISTRICT COURT
22
23 FOR THE EASTERN DISTRICT OF CALIFORNIA
24
25

26 **RALPH COLEMAN, et al.,**

27 Plaintiffs,

28 v.

29 **ARNOLD SCHWARZENEGGER, et al.,**

30 Defendants.

31 CASE NO. CIV S-90-0520 LKK
32 JFM P

33 **STIPULATION AND ORDER
34 RE: DEADLINE FOR
35 DEFENDANTS' SUBMISSION
36 OF PLAN TO ADDRESS
37 SUICIDE TRENDS IN
38 ADMINISTRATIVE
39 SEGREGATION UNITS**

40 I.
41

42 **INTRODUCTION**

43 On or about June 8, 2006, this Court ordered Defendants to develop a plan for dealing
44 with the escalating percentage of suicides occurring in administrative segregation units, with the
45 plan due on August 31, 2006. The court order further stated that the plan shall include, as
46 appropriate, a budget and implementation schedule for any policy and procedure changes,
47 staffing or budget augmentation, and, if necessary, include a mechanism for obtaining mid-year
48 funding on or before September 30, 2006.

1 On July 14, 2006, the Special Master, certain court-appointed experts, the parties and
2 their experts met and discussed the issues surrounding suicides in administrative segregation
3 units.

4 Defendants work on this plan is underway. However, additional time is necessary to
5 fully develop and finalize certain aspects of the plan. Defendants understand Plaintiffs desire an
6 opportunity to review a draft of the plan before it is submitted to the Court.

III.

STIPULATION

The parties, by and through their counsels, hereby agree:

10 1. The due date for the final plan addressing suicide trends in the administrative
11 segregation units may be extended from August 31, 2006 to October 2, 2006.

12 2. The plan will still include, as appropriate, a budget and implementation schedule
13 for any policy and procedure changes, staffing or budget augmentation, and, if necessary, include
14 a mechanism for obtaining mid-year funding. The date for obtaining mid-year funding will be
15 extended from on or before September 30, 2006 to October 2, 2006.

16 3. Defendants agree to provide Plaintiffs' counsel and Special Master Keating a copy
17 of the draft plan addressing suicide trends in the administrative segregation units on or before
18 September 5, 2006.

19 4. Defendants agree to arrange a teleconference on or about September 12, 2006 or

20 //

21 //

22 | //

23 //

31 //

26 | P

26

66

5

STIPULATION, ORDER RE. AD SEG PLAN

1 another mutually convenient date with Plaintiffs' counsel, Plaintiffs' experts, Defendants'
2 experts, and Special Master Keating and his experts to discuss any comments to the draft plan.

3 Dated: August 17, 2006

/s / Lisa A. Tillman

Lisa A. Tillman, Esq.
Deputy Attorney General
Attorney for Defendants

5 Dated: August 17, 2006

/s / Michael W. Bien

Michael W. Bien, Esq.
Rosen, Bien & Asaro, LLP
Attorney for Plaintiffs

9 ORDER

10 This Court has reviewed the above stipulation of the parties concerning the extension
11 of the due date for Defendants' plan to address suicide trends in administrative segregation units.
12 The Court hereby approves the stipulation and so orders:

13 1. The due date for the final plan addressing suicide trends in the administrative
14 segregation units may be extended from August 31, 2006 to October 2, 2006.

15 2. The plan will still include, as appropriate, a budget and implementation schedule
16 for any policy and procedure changes, staffing or budget augmentation, and, if necessary, include
17 a mechanism for obtaining mid-year funding. The date for obtaining mid-year funding will be
18 extended from on or before September 30, 2006 to October 2, 2006.

19 3. Defendants will provide Plaintiffs' counsel and Special Master Keating a copy
20 of the draft plan addressing suicide trends in the administrative segregation units on or before
21 September 5, 2006.

22 4. Defendants will arrange a teleconference on or about September 12, 2006 or
23 another mutually convenient date with Plaintiffs' counsel, Plaintiffs' experts, Defendants'
24 experts, and Special Master Keating and his experts to discuss any comments to the draft plan.

25 Dated: September 8, 2006.

26
27 
28 LAWRENCE K. KARLTON
SENIOR JUDGE
UNITED STATES DISTRICT COURT