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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 **RALPH COLEMAN, et al.,**
 16 Plaintiffs,
 17 v.
 18 **EDMUND G. BROWN JR., et al.,**
 19 Defendants.
 20

2:90-cv-00520 KJM DAD PC
THREE-JUDGE COURT

21 **MARCIANO PLATA, et al.,**
 22 Plaintiffs,
 23 v.
 24 **EDMUND G. BROWN JR., et al.,**
 25 Defendants.
 26

C01-1351 TEH
THREE-JUDGE COURT
**STIPULATION AND [PROPOSED]
 ORDER IN RESPONSE TO NOVEMBER
 14, 2014 ORDER**

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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

By: /s/ *Patrick R. McKinney*
PATRICK R. MCKINNEY
Supervising Deputy Attorney General
Attorneys for Defendants

Dated: December 12, 2014

HANSON BRIDGETT LLP
By: /s/ *Paul B. Mello*
PAUL B. MELLO
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Dated: December 12, 2014

PRISON LAW OFFICE

BY: /s/ *Donald Specter*
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Dated: December 12, 2014

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BY: /s/ *Michael W. Bien*
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[PROPOSED] ORDER

Pursuant to the foregoing stipulation, IT IS SO ORDERED.

Dated: December __, 2014

STEPHEN REINHARDT
UNITED STATES CIRCUIT JUDGE
NINTH CIRCUIT COURT OF APPEALS

Dated: December __, 2014

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

Dated: December __, 2014

KIMBERLY J. MUELLER
UNITED STATES DISTRICT JUDGE
EASTERN DISTRICT OF CALIFORNIA