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15 Attorneys for Plaintiffs

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

20 CALIFORNIA COALITION FOR WOMEN
PRISONERS et al.,

21 Plaintiffs,

22 v.

23 UNITED STATES OF AMERICA FEDERAL
24 BUREAU OF PRISONS et al.,

25 Defendants.

Case No. 4:23-cv-04155-YGR

**JOINT STIPULATION AND
[PROPOSED] ORDER TO EXTEND
PRELIMINARY INJUNCTION**

Judge: Hon. Yvonne Gonzalez Rogers

Trial Date: June 23, 2025

1 Pursuant to Fed. R. Civ. P. 6(b) and L.R. 6-1(b), Plaintiffs and Defendants
2 (collectively, the “Parties”), by and through their undersigned counsel of record, have
3 conferred and hereby stipulate as follows:

4 WHEREAS the parties seek to preserve the status quo at this time, the parties
5 jointly request that the Court extend the injunctive relief previously authorized in the
6 matter by 90 days to run from December 31, 2024 and expire on March 31, 2025. The
7 parties jointly represent there is sufficient justification to extend the relief to enable the
8 parties to continue negotiations and mediations. The parties agree that neither side will file
9 any motions with this Court prior to November 22, 2024. This request is made without
10 prejudice to any parties’ positions regarding appeals or challenges to jurisdiction in the
11 event the case is not resolved via mediation.

12
13 DATED: November 6, 2024

Respectfully submitted,
ROSEN BIEN GALVAN & GRUNFELD LLP

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15 By: /s/ Kara J. Janssen

Kara J. Janssen

16
17 Attorneys for Plaintiffs

18 DATED: November 6, 2024

JESSE A. LASLOVICH
United States Attorney

19
20
21 By: /s/ Madison Mattioli

MADISON L. MATTIOLI

22 ABBIE J.N. CZIOK

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24 Assistant U.S. Attorneys

25 Attorneys for Federal Defendants

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ECF ATTESTATION

In accordance with Civil Local Rule 5-1(i)(3), I, Kara Janssen, attest that I have obtained concurrence in the filing of this document from all other signatories listed here.

By: /s/ Kara J. Janssen
Kara J. Janssen

~~**PROPOSED**~~ **ORDER**

Pursuant to the stipulation, the Court GRANTS the Parties request to extend the injunctive relief previously authorized in the matter by 90 days to run from December 31, 2024 and expire on March 31, 2025.

PURSUANT TO STIPULATION, IT IS SO ORDERED

DATED: November 6, 2024


HON. YVONNE GONZALEZ ROGERS
United States District Judge