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9 Attorneys for Plaintiffs

10 UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 QUINTON GRAY, et al., on behalf of
13 themselves and all others similarly
14 situated,
15 Plaintiffs,
16 v.
17 COUNTY OF RIVERSIDE,
18 Defendant.

Case No. EDCV13-0444 VAP (OP)

CLASS ACTION

**STIPULATION AND PROPOSED
ORDER**

19 On April 4, 2020, this Court granted Plaintiffs' Emergency Motion to Enforce
20 the Consent Decree and ordered Defendant to develop and implement a plan to
21 minimize the spread of COVID-19 in the Riverside County jails, consistent with the
22 guidance of the Centers for Disease Control and Prevention (CDC) and the Court
23 experts. ECF No. 193. The Court directed that the plan include an evaluation of
24 current jail capacity to house people safely consistent with physical distancing to
25 reduce transmission of COVID-19; a plan to safely house and care for people
26 incarcerated in the jails who are at high risk for severe complications from COVID-
27 19 based on guidance from the CDC and the Court experts; adequate hygiene and
28 cleaning measures, including education of the people incarcerated in the jails,

1 consistent with the CDC’s guidelines; and measures to address the mental health
2 needs of people held in quarantine or isolation, as noted by the Court mental health
3 expert. *Id.* The Court further directed the parties to participate in mediation with
4 Judge Raul Ramirez to resolve any disputes over the adequacy of the plan and the
5 production of underlying data. *Id.*

6 The parties have successfully resolved their negotiations and hereby stipulate
7 that the plan attached as Exhibit A to the Proposed Order filed herewith complies
8 with the Court’s direction.

9 The parties further stipulate that this relief meets the requirements of 18
10 U.S.C. § 3626: the relief is narrowly drawn, extends no further than necessary to
11 ensure the protection of the federal constitutional and statutory rights of Plaintiffs,
12 and is the least intrusive means necessary to accomplish those objectives.

13
14 **IT IS SO AGREED AND STIPULATED.**

15 DATED: July 20, 2020

LEWIS BRISBOIS BISGAARD & SMITH LLP

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18 By: /s/ Arthur K. Cunningham
19 Arthur K. Cunningham
20 Attorneys for Defendant,
COUNTY OF RIVERSIDE

21
22 **IT IS SO AGREED AND STIPULATED.**

