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Attorneys for Plaintiffs
 JILLIAN PIERCE, NICOLE WADE,
 and VINCENT KEITH BELL on behalf
 of themselves and all others similarly situated,

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

JILLIAN PIERCE, NICOLE WADE,
 VINCENT KEITH BELL, on behalf of
 themselves and all others similarly
 situated,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN
 FRANCISCO, San Francisco Sheriff's
 Department Sheriff VICKI HENNESSY,
 San Francisco Sheriff's Department Chief
 Deputy MICHELE FISHER, and County
 of San Francisco employees DOES 1-50, ,

Defendant(s).

Case No.: 4:19-cv-07659-JSW

**STIPULATION AND ~~[PROPOSED]~~
 ORDER FOR REFERRAL TO
 MAGISTRATE FOR SETTLEMENT**

On May 1, 2020, plaintiffs filed their First Amended Complaint alleging that
 defendant City and County of San Francisco does not provide outdoor recreation time to
 prisoners in San Francisco County Jail # 2, located at 425 7th Street in San Francisco.

1 (ECF No. 29.) Defendants' response is due on May 29, 2020, pursuant to a stipulation of
2 the parties and Order of this Court. (ECF No. 30.)

3 Defendant City and County of San Francisco is named in two other cases in the
4 Northern District of California addressing similar conditions issues at San Francisco
5 County Jails #4 and #5, located at 850 Bryant Street, 7th Floor in San Francisco and 1
6 Moreland Drive in San Bruno, respectively. The cases are *Norbert v. San Francisco*
7 *Sheriff's Department*, No. 19-cv-02724-SK and *Poot v. San Francisco Sheriff's*
8 *Department*, No. 19-cv-02722-YGR.

9 Magistrate Judge Laurel Beeler is overseeing settlement negotiations in *Norbert*
10 and *Poot*. The parties in those matters and the undersigned agree that judicial economy
11 would be well served by referring this matter to Judge Beeler for settlement.

12 Plaintiffs' First Amended Complaint raises claims for relief related to cross
13 gender body cavity searches that are not at issue in *Norbert* or *Poot*. However, the
14 parties are amenable to attempting a resolution of both issues through settlement with
15 Judge Beeler.

16 In an effort to be as efficient as possible, the parties stipulate and respectfully
17 request that the Court refer this entire matter to Magistrate Judge Laurel Beeler for
18 settlement. The parties further stipulate and respectfully request that the Court vacate
19 all current deadlines in this matter, including the deadline for defendants' response to
20 plaintiffs' First Amended Complaint, and allow the parties to attempt early resolution.
21 The parties request a deadline for a joint status update to the Court be set for June 30,
22 2020, at which time the parties will inform the Court of its progress on settlement and
23 reset case management dates in this matter if prudent at that time. Although the parties
24 will make a good faith effort to resolve all claims in the case, the parties contemplate
25 that some but not all of plaintiffs' claims may be resolved by participating in the *Norbert*
26 and *Poot* settlement discussions with Judge Beeler. In that event, the parties will
27 provide the Court with that information in their joint status update and may at that time
28

1 request to set case management deadlines for the remaining claims that have not
2 settled.

3
4
5 Dated: May 14, 2020

Respectfully submitted,

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7 SIEGEL, YEE, BRUNNER & MEHTA

8 By: /s/Andrew Chan Kim
9 Andrew Chan Kim

10 Attorneys for Plaintiff
11 JILLIAN PIERCE, NICOLE WADE,
12 VINCENT KEITH BELL, on behalf of
themselves and all others similarly
situated,

13 Dated: May 14, 2020

14 DENNIS J. HERRERA
15 City Attorney
16 MEREDITH B. OSBORN
17 Chief Trial Deputy
18 RAYMOND ROLLAN
19 Deputy City Attorney

20 By: **/s/Raymond Rollan
21 RAYMOND ROLLAN

22 Attorneys for Defendant
23 CITY AND COUNTY OF SAN
24 FRANCISCO

25 ***Pursuant to Civil L.R. 5-1(i)(3), the*
26 *electronic signatory has obtained*
27 *approval from this signatory.*
28

~~[PROPOSED]~~ ORDER

Pursuant to stipulation and good cause showing, IT IS SO ORDERED. This matter is referred to Magistrate Judge Laurel Beeler for settlement. The current case management deadlines in this matter, including defendants' deadline to respond to plaintiffs' First Amended Complaint, are vacated. The parties are ordered to submit a joint written status update no later than June 30, 2020.

Dated: May ¹⁵__, 2020



Hon. Jeffrey S. White
United States District Court Judge