

ROB BONTA, State Bar No. 202668
Attorney General of California
ALICIA A. BOWER, State Bar No. 287799
Supervising Deputy Attorney General
JACQUELINE KALLBERG, State Bar No. 298886
DESTINY SALCIDO, State Bar No. 357153
ARTHUR B. MARK III, State Bar No. 220865
Deputy Attorneys General
1300 I Street, Suite 125
P.O. Box 944255
Sacramento, CA 94244-2550
Telephone: (916) 210-7345
Fax: (916) 324-5205
E-mail: Arthur.Mark@doj.ca.gov
Attorneys for Defendants
California Department of Corrections and
Rehabilitation, I. Arroyo, V. Ramolete, E. Becerra,
M. Felix, and Y. Abrego

ROBERT CHALFANT LAW, PC
ROBERT CHALFANT (SBN 203051)
13620 Lincoln Way, Suite 325
Auburn, California 95603
Telephone: (916) 647-7728
Facsimile: (916) 930-6093
Attorneys for Plaintiffs
Wind, Cameron, Monroe, Gutierrez, Salinas,
Muhammad, Yancey, Clark, De Leon Guerrero,
Randolph, Reyes, Manzano, and Milan

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

CHRISTINA WIND, et al.,

Plaintiff,

v.

STATE OF CALIFORNIA, et al.,

Defendants.

Case No. 1:25-cv-00266-JLT-HBK

**STIPULATION FOR VOLUNTARY
DISMISSAL WITH PREJUDICE
(Fed. R. Civ. P. 41(a)(1)(A)(ii))**

1 Plaintiffs Wind, Cameron, Monroe, Gutierrez, Salinas, Muhammad, Yancey, Clark, De
2 Leon Guerrero, Randolph, Reyes, Manzano, and Milan, and Defendants California Department of
3 Corrections and Rehabilitation, I. Arroyo, V. Ramolete, E. Becerra, M. Felix, Y. Abrego¹, and C.
4 Mendoza, by and through their counsel, have resolved this case in its entirety. Therefore, the
5 parties stipulate to a dismissal of this action with prejudice under Federal Rule of Civil
6 Procedure 41(a)(1)(A)(ii).

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27 ¹ The State of California, F. Arroyo and A. De La Cruz were omitted as defendants in
28 Plaintiffs' First Amended Complaint (ECF No. 24) and thus were dismissed from this action.
See Hal Roach Studios, Inc. v. Richard Feiner & Co., 896 F.2d 1542, 1546 (9th Cir. 1989)

Each party shall bear its own litigation costs and attorney's fees.

It is so stipulated.

Dated: March 19, 2026

Respectfully submitted,

ROB BONTA
Attorney General of California
ALICIA A. BOWER
Supervising Deputy Attorney General
JACQUELINE KALLBERG
Deputy Attorney General

/s/ Arthur B. Mark III

ARTHUR B. MARK III
Deputy Attorney General
Attorneys for Defendants
I. Arroyo, V. Ramolete, E. Becerra,
M. Felix and Y. Abrego, and California
Department of Corrections and
Rehabilitation

Dated: March 19, 2026

LAW OFFICE OF ROBERT CHALFANT

/s/ Robert Chalfant

Robert Chalfant
Attorney for Plaintiffs Wind, Cameron,
Monroe, Gutierrez, Salinas, Muhammad,
Yancey, Clark, De Leon Guerrero, Randolph,
Reyes, Manzano, and Milan
(as authorized March 19, 2026)

Dated: March 19, 2026

ANDRADA & ASSOCIATES

/s/ Lynne G. Stocker

Lynne G. Stocker
Attorney for Defendant Mendoza
(as authorized March 19, 2026)

SA2025301262/39713634S

CERTIFICATE OF SERVICE

Case Name: **Christina Wind, et al. v. State of California, et al.** No. **1:25-cv-00266-JLT-HBK**

I hereby certify that on March 19, 2026, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

- **STIPULATION FOR VOLUNTARY DISMISSAL WITH PREJUDICE (Fed. R. Civ. P. 41(a)(1)(A)(ii))**

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on March 19, 2026, at Sacramento, California.

K. Vitalie
Declarant

/s/ *K. Vitalie*
Signature