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10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**  
12

13 MARCIANO PLATA, et al.,

14 Plaintiffs,

15 v.

16 GAVIN NEWSOM, et al.,

17 Defendants.  
18

CASE NO. 01-1351 JST

**DEFENDANTS' ADDENDUM TO  
OPPOSITION TO PLAINTIFFS'  
MOTION FOR ORDER MODIFYING  
CDCR'S COVID-19 STAFF TESTING  
PLAN**

19  
20 At the August 12, 2020 hearing on Plaintiffs' Motion for Order Modifying CDCR's  
21 COVID-19 Staff Testing Plan, counsel for the State indicated that CDCR's staff testing plan was  
22 in the process of being revised and that a new and updated plan would be imminently released.  
23 Defendants now submit to this Court<sup>1</sup> the State's most current COVID-19 Staff Testing Guidance,  
24 which is dated August 12, 2020. (*See* Exhibit A.)  
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26 \_\_\_\_\_  
27 <sup>1</sup> Defendants also provided Plaintiffs' counsel with a copy of the Staff Testing Plan on August 17,  
28 2020, prior to this filing.

1 This updated policy was developed under guidance from the California Department of  
2 Public Health (CDPH). The State is working collaboratively with California Correctional Health  
3 Care Services to implement the updated timeframes outlined in the policy. CDCR expects to have  
4 plans in place to begin implementation of the more aggressive testing turnaround times set forth in  
5 the policy within 30 days and full implementation of the policy in 12 weeks. However, as noted in  
6 the policy, timeframes will be dependent upon laboratory capacity and the policy will be subject to  
7 further change based on Centers for Disease Control and CDPH guidance or guidelines.

8 DATED: August 17, 2020

HANSON BRIDGETT LLP

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By:           /s/ Samantha Wolff          

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14 DATED: August 17, 2020

XAVIER BECERRA  
Attorney General of California

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By:           /s/ Damon McClain          

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