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9
 10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**
 12 **OAKLAND DIVISION**

13 MARCIANO PLATA, et al.,
 14 Plaintiffs,
 15 v.
 16 GAVIN NEWSOM, et al.,
 17 Defendants.
 18

CASE NO. 01-1351 JST

**DECLARATION OF RYAN GILLE IN
 SUPPORT OF DEFENDANTS’
 ADMINISTRATIVE MOTION TO
 MODIFY BRIEFING SCHEDULE ON
 PLAINTIFFS’ MOTION RE:
 QUARANTINE AND ISOLATION
 SPACE**

Judge: Hon. Jon S. Tigar

19
 20 I, Ryan Gille, declare:

- 21 1. I am the lead Deputy Attorney General and an attorney of record for Defendants.
 22 2. Attached as Exhibit A is a true copy of an email exchange between myself and Ms.
 23 Norman regarding Defendants’ request to receive Plaintiffs’ draft memorandum of points and
 24 authorities and expert’s opinion before drafting and exchanging Defendants’ position.
 25 Alternatively, Defendants requested a stipulated extension of time to prepare a joint brief
 26 regarding Plaintiffs’ motion related to Quarantine and Isolation.
 27 3. Plaintiffs make much of the fact that Defendants indicated during the last Case
 28

Exhibit A

Ryan Gille

From: Sara Norman <snorman@prisonlaw.com>
Sent: Wednesday, November 25, 2020 1:52 PM
To: Ryan Gille; Damon McClain
Cc: Martin Dodd; Paul B. Mello; Samantha Wolff; Iram Hasan; Stafford, Carrie@CDCR; Scofield, Bryant; Gipson, Connie@CDCR; Cullen, Vincent@CDCR; Foss, Tammy@CDCR; Prather, Alyssa@CDCR; Kelso, Clark@CDCR; Barrow, Roscoe@CDCR; Kirkland, Richard@CDCR; Toche, Diana@CDCR; Neill, Jennifer@CDCR; Alison Hardy; Don Specter; Rana Anabtawi; Sophie Hart; Steven Fama
Subject: RE: CDCR's quarantine and isolate set-aside space

Hi Ryan,

I understand your position, but I disagree; I think Judge Tigar, noting that a joint brief would require the parties to "exchange their positions," did in fact intend that exchange to be simultaneous.

I do not think you can claim surprise here, since I proposed to Damon on November 16 that we "exchange preliminary positions" on December 3 and then exchange modified positions and file the joint brief on December 10 for a December 17 hearing. At the Case Management Conference, Paul said that "we have considered your dates and were going to propose minor modifications."

(RT at 12:1-2.) (Paul also stated that "the 17th. . . does work for us for a hearing date" but later proposed December 23 for the hearing. (RT at 13:8-12, 34:12-19.)) The dates that I currently propose -- that we exchange briefs on December 4 for a December 9 filing -- are almost identical to the original proposal that was apparently generally acceptable to you.

If it is helpful to you, I can tell you that we anticipate a very straightforward, simple argument. At this point, I expect our section to be in the range of 10 pages. The issue is well known to all of us, and was in fact debated extensively by the Public Health Workgroup, which included your expert. As I have offered several times, feel free to call to discuss if you would like further clarification of our position, but I believe you have more than enough information to work with your public health expert and draft your position.

I hope you understand that we are pressing this issue solely because of the extremity of the circumstances. A month ago, CDCR had its lowest number of active cases statewide for several months (about 325, on October 22). Now, there are nearly 3,000 – the highest number ever. Hospitalizations and deaths lag behind active cases, so we very much fear that the situation for our clients will worsen drastically in coming weeks.

If you continue to disagree, you are of course free to take your position to the judge. I ask that you attach these emails so that he will understand the relative positions of the parties.

--Sara

-----Original Message-----

From: Ryan Gille [mailto:Ryan.Gille@doj.ca.gov]
Sent: Wednesday, November 25, 2020 12:54 PM
To: Sara Norman <snorman@prisonlaw.com>; Damon McClain <Damon.McClain@doj.ca.gov>
Cc: Martin Dodd <MDodd@fddcm.com>; Paul B. Mello <Pmello@hansonbridgett.com>; Samantha Wolff <SWolff@hansonbridgett.com>; Iram Hasan <Iram.Hasan@doj.ca.gov>; Stafford, Carrie@CDCR <Carrie.Stafford@cdcr.ca.gov>; Scofield, Bryant <Bryant.Scofield@cdcr.ca.gov>; Gipson, Connie@CDCR <Connie.Gipson@cdcr.ca.gov>; Cullen, Vincent@CDCR <Vincent.Cullen@cdcr.ca.gov>; Foss, Tammy@CDCR <Tammy.Foss@cdcr.ca.gov>; Prather, Alyssa@CDCR <Alyssa.Prather@cdcr.ca.gov>; Kelso, Clark@CDCR

<Clark.Kelso@cdcr.ca.gov>; Barrow, Roscoe@CDCR <Roscoe.Barrow@cdcr.ca.gov>; Kirkland, Richard@CDCR <Richard.Kirkland@cdcr.ca.gov>; Toche, Diana@CDCR <Diana.Toche@cdcr.ca.gov>; Neill, Jennifer@CDCR <Jennifer.Neill@cdcr.ca.gov>; Alison Hardy <ahardy@prisonlaw.com>; Don Specter <dspecter@prisonlaw.com>; Rana Anabtawi <rana@prisonlaw.com>; Sophie Hart <sophiehart@prisonlaw.com>; Steven Fama <sfama@prisonlaw.com>
Subject: RE: CDCR's quarantine and isolate set-aside space

Sara,

Thank you for getting back to us. While we agree that Judge Tigar opted for a joint briefing, the reasoning he gave at the hearing was that a joint brief is a quicker and more convenient way for him and his staff to review the parties' positions than the traditional motion, opposition, reply format. He did not specify the mechanics of how the brief should come together, and did not require the simultaneous exchange of drafts. While you have provided the general topic of Plaintiffs' motion, we cannot adequately respond to Plaintiffs' position without knowing the specifics of your arguments, the legal authorities upon which you will rely, and your expert's opinions. The purpose of the motion is to give Judge Tigar reasoned legal arguments and expert opinions so he has all the information and counterpoints to make the best decision. This will not be achieved when you have been working on the issue for months and we would realistically only have two business days to review your legal arguments, review your expert's opinions, confer with our clients, confer with our experts, and prepare a response.

If your position remains unchanged, we will likely file an administrative motion to seek additional time to prepare our response to your motion, understanding that our respective positions would ultimately be combined into a joint brief.

Best,

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Facsimile: (415) 703-5843
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-----Original Message-----

From: Sara Norman <snorman@prisonlaw.com>
Sent: Wednesday, November 25, 2020 11:20 AM
To: Ryan Gille <Ryan.Gille@doj.ca.gov>; Damon McClain <Damon.McClain@doj.ca.gov>
Cc: Martin Dodd <MDodd@fddcm.com>; Paul B. Mello <Pmello@hansonbridgett.com>; Samantha Wolff <SWolff@hansonbridgett.com>; Iram Hasan <Iram.Hasan@doj.ca.gov>; Stafford, Carrie@CDCR <Carrie.Stafford@cdcr.ca.gov>; Scofield, Bryant <Bryant.Scofield@cdcr.ca.gov>; Gipson, Connie@CDCR <Connie.Gipson@cdcr.ca.gov>; Cullen, Vincent@CDCR <Vincent.Cullen@cdcr.ca.gov>; Foss, Tammy@CDCR <Tammy.Foss@cdcr.ca.gov>; Prather, Alyssa@CDCR <Alyssa.Prather@cdcr.ca.gov>; Kelso, Clark@CDCR <Clark.Kelso@cdcr.ca.gov>; Barrow, Roscoe@CDCR <Roscoe.Barrow@cdcr.ca.gov>; Kirkland, Richard@CDCR <Richard.Kirkland@cdcr.ca.gov>; Toche, Diana@CDCR <Diana.Toche@cdcr.ca.gov>; Neill, Jennifer@CDCR <Jennifer.Neill@cdcr.ca.gov>; Alison Hardy <ahardy@prisonlaw.com>; Don Specter <dspecter@prisonlaw.com>; Rana Anabtawi <rana@prisonlaw.com>; Sophie Hart <sophiehart@prisonlaw.com>; Steven Fama <sfama@prisonlaw.com>
Subject: RE: CDCR's quarantine and isolate set-aside space

Hi Ryan,

The judge explicitly rejected the traditional briefing schedule, with motion/opposition/reply, in favor of a process where the parties "exchange their positions" prior to filing and then work together to identify areas of agreement and dispute. We think the schedule we propose below (which is almost identical to the one we proposed last week), with the first exchange of briefs and expert declarations on December 4, is reasonable.

If you have questions about our position, I am happy to discuss. Simply put, we believe that quarantine must take place in solid-door cells, and that CDCR must follow the policy set forth in the Movement Matrix to set aside space to account for precautionary quarantine.

--Sara

-----Original Message-----

From: Ryan Gille [mailto:Ryan.Gille@doj.ca.gov]

Sent: Wednesday, November 25, 2020 10:49 AM

To: Sara Norman <snorman@prisonlaw.com>; Damon McClain <Damon.McClain@doj.ca.gov>

Cc: Martin Dodd <MDodd@fddcm.com>; Paul B. Mello <Pmello@hansonbridgett.com>; Samantha Wolff

<SWolff@hansonbridgett.com>; Iram Hasan <Iram.Hasan@doj.ca.gov>; Stafford, Carrie@CDCR

<Carrie.Stafford@cdcr.ca.gov>; Scofield, Bryant <Bryant.Scofield@cdcr.ca.gov>; Gipson, Connie@CDCR

<Connie.Gipson@cdcr.ca.gov>; Cullen, Vincent@CDCR <Vincent.Cullen@cdcr.ca.gov>; Prather, Alyssa@CDCR

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<Roscoe.Barrow@cdcr.ca.gov>; Kirkland, Richard@CDCR <Richard.Kirkland@cdcr.ca.gov>; Toche, Diana@CDCR

<Diana.Toche@cdcr.ca.gov>; Neill, Jennifer@CDCR <Jennifer.Neill@cdcr.ca.gov>; Alison Hardy

<ahardy@prisonlaw.com>; Don Specter <dspecter@prisonlaw.com>; Rana Anabtawi <rana@prisonlaw.com>; Sophie

Hart <sophieh@prisonlaw.com>; Steven Fama <sfama@prisonlaw.com>

Subject: RE: CDCR's quarantine and isolate set-aside space

Sara,

If Plaintiffs insist on sticking with the December 9 filing deadline, we will need time to review your moving brief and expert declaration before we can oppose it. Accordingly, we propose that you send us Plaintiffs' brief and expert declaration by noon on Monday, November 30, so that we have adequate time to review your arguments and expert declaration. On Monday December 7, by 5:00 p.m., we would provide our opposition brief and expert declaration to be included in the joint brief. Updated drafts would be exchanged by 5:00 p.m. on December 8, and the brief would be put in final form by 2:00 p.m. on December 9. Please keep in mind that we have a joint Case management Conference Statement due on December 9 as well.

Best,

Ryan Gille

Office of the Attorney General

Department of Justice, State of California

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E-mail: Ryan.Gille@doj.ca.gov<mailto:Ryan.Gille@doj.ca.gov>

From: Sara Norman <snorman@prisonlaw.com>

Sent: Tuesday, November 24, 2020 4:08 PM

To: Ryan Gille <Ryan.Gille@doj.ca.gov>; Damon McClain <Damon.McClain@doj.ca.gov>
Cc: Martin Dodd <MDodd@fddcm.com>; Paul B. Mello <Pmello@hansonbridgett.com>; Samantha Wolff <SWolff@hansonbridgett.com>; Iram Hasan <Iram.Hasan@doj.ca.gov>; Stafford, Carrie@CDCR <Carrie.Stafford@cdcr.ca.gov>; Scofield, Bryant <Bryant.Scofield@cdcr.ca.gov>; Gipson, Connie@CDCR <Connie.Gipson@cdcr.ca.gov>; Cullen, Vincent@CDCR <Vincent.Cullen@cdcr.ca.gov>; Prather, Alyssa@CDCR <Alyssa.Prather@cdcr.ca.gov>; Kelso, Clark@CDCR <Clark.Kelso@cdcr.ca.gov>; Barrow, Roscoe@CDCR <Roscoe.Barrow@cdcr.ca.gov>; Kirkland, Richard@CDCR <Richard.Kirkland@cdcr.ca.gov>; Toche, Diana@CDCR <Diana.Toche@cdcr.ca.gov>; Neill, Jennifer@CDCR <Jennifer.Neill@cdcr.ca.gov>; Alison Hardy <ahardy@prisonlaw.com>; Don Specter <dspecter@prisonlaw.com>; Rana Anabtawi <rana@prisonlaw.com>; Sophie Hart <sophiehart@prisonlaw.com>; Steven Fama <sfama@prisonlaw.com>
Subject: RE: CDCR's quarantine and isolate set-aside space

Hi Ryan,

We have carefully considered and discussed your request. I'm sorry to do this, but we need to stick to the December 23 hearing date we initially proposed and which the judge offered as an option in his order on Friday. Cases are spiking to terrifying degrees all around us and the outbreaks keep coming in CDCR. We have raised our position repeatedly for months without success and we believe that it is well past time to set it before the judge.

I am hoping it is not difficult for you to collect the information we request, which seems fairly straightforward to me. Again, I'm happy to discuss on the phone if that would be helpful in clarifying what we want.

--Sara

From: Ryan Gille
[mailto:Ryan.Gille@doj.ca.gov<mailto:Ryan.Gille@doj.ca.gov>]
Sent: Tuesday, November 24, 2020 3:32 PM
To: Sara Norman <snorman@prisonlaw.com<mailto:snorman@prisonlaw.com>>;
Damon McClain <Damon.McClain@doj.ca.gov<mailto:Damon.McClain@doj.ca.gov>>
Cc: Martin Dodd <MDodd@fddcm.com<mailto:MDodd@fddcm.com>>; Paul B. Mello <Pmello@hansonbridgett.com<mailto:Pmello@hansonbridgett.com>>; Samantha Wolff <SWolff@hansonbridgett.com<mailto:SWolff@hansonbridgett.com>>; Iram Hasan <Iram.Hasan@doj.ca.gov<mailto:Iram.Hasan@doj.ca.gov>>; Stafford, Carrie@CDCR <Carrie.Stafford@cdcr.ca.gov<mailto:Carrie.Stafford@cdcr.ca.gov>>;
Scofield, Bryant <Bryant.Scofield@cdcr.ca.gov<mailto:Bryant.Scofield@cdcr.ca.gov>>; Gipson, Connie@CDCR <Connie.Gipson@cdcr.ca.gov<mailto:Connie.Gipson@cdcr.ca.gov>>;
Cullen, Vincent@CDCR <Vincent.Cullen@cdcr.ca.gov<mailto:Vincent.Cullen@cdcr.ca.gov>>; Prather, Alyssa@CDCR <Alyssa.Prather@cdcr.ca.gov<mailto:Alyssa.Prather@cdcr.ca.gov>>;
Kelso, Clark@CDCR <Clark.Kelso@cdcr.ca.gov<mailto:Clark.Kelso@cdcr.ca.gov>>;
Barrow, Roscoe@CDCR <Roscoe.Barrow@cdcr.ca.gov<mailto:Roscoe.Barrow@cdcr.ca.gov>>; Kirkland, Richard@CDCR <Richard.Kirkland@cdcr.ca.gov<mailto:Richard.Kirkland@cdcr.ca.gov>>;
Toche, Diana@CDCR <Diana.Toche@cdcr.ca.gov<mailto:Diana.Toche@cdcr.ca.gov>>; Neill, Jennifer@CDCR <Jennifer.Neill@cdcr.ca.gov<mailto:Jennifer.Neill@cdcr.ca.gov>>; Alison Hardy <ahardy@prisonlaw.com<mailto:ahardy@prisonlaw.com>>; Don Specter <dspecter@prisonlaw.com<mailto:dspecter@prisonlaw.com>>; Rana Anabtawi <rana@prisonlaw.com<mailto:rana@prisonlaw.com>>; Sophie Hart

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<sfama@prisonlaw.com<mailto:sfama@prisonlaw.com>>
Subject: RE: CDCR's quarantine and isolate set-aside space

Sara,

Good afternoon and thank you for your email regarding your proposed briefing schedule. In light of the logistics in obtaining the information you are requesting and the information we need to respond, coupled with the practicalities of getting the information over the Thanksgiving holidays, we would propose making December 31 as the deadline to file the joint brief.

We think it may be more beneficial for the parties to meet and confer, collect as much of the pertinent information as possible, so that we can provide the court with the best and most accurate information possible.

While we understand PLO's desire to move forward with the motion, we feel it would be more constructive to all parties and the court if we provided the joint brief on December 31. Otherwise, we run the risk of rushing to file an incomplete joint motion without all of the information that Judge Tigar would likely need to make an informed decision.

Please let me know if PLO will consider this request.

Best,

Ryan Gille
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From: Sara Norman <snorman@prisonlaw.com<mailto:snorman@prisonlaw.com>>
Sent: Tuesday, November 24, 2020 2:45 PM
To: Damon McClain
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<sfama@prisonlaw.com<mailto:sfama@prisonlaw.com>>
Subject: RE: CDCR's quarantine and isolate set-aside space

Hello again Damon,

We would like to have our quarantine motion heard on December 23, which means filing the joint brief on December 9. We propose exchanging our briefs and expert declarations by the end of the day on Friday, December 4. We would then have until December 9 to make any modifications to our own sections and generate together the lists of agreements and disputes that the judge wanted us to file.

I would also appreciate it if you could send me an answer to my email below, or let me know when you'd like to discuss it, if that would make more sense.

(And happy Thanksgiving.)

--Sara

From: Sara Norman
[mailto:snorman@prisonlaw.com<mailto:snorman@prisonlaw.com>]
Sent: Thursday, November 19, 2020 5:28 PM
To: 'Damon McClain'
<Damon.McClain@doj.ca.gov<mailto:Damon.McClain@doj.ca.gov>>; 'Cullen, Vincent@CDCR'
<Vincent.Cullen@cdcr.ca.gov<mailto:Vincent.Cullen@cdcr.ca.gov>>; 'Gipson, Connie@CDCR'
<Connie.Gipson@cdcr.ca.gov<mailto:Connie.Gipson@cdcr.ca.gov>>
Cc: 'Martin Dodd' <MDodd@fddcm.com<mailto:MDodd@fddcm.com>>; 'Paul B.
Mello' <Pmello@hansonbridgett.com<mailto:Pmello@hansonbridgett.com>>;
'Samantha Wolff'
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'Prather, Alyssa@CDCR'
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