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Attorneys for Defendants

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

HUMAN RIGHTS DEFENSE CENTER,  
  
Plaintiff,

vs.

COUNTY OF SONOMA; EDDIE  
ENGRAM, Sheriff, individually and in his  
official capacity; MELISSA PARMENTER,  
Detention Division Operations Captain,  
individually and in her official capacity; and  
JOHN AND JANE DOES 1-10, Staff,  
individually and in their official capacities, ,  
  
Defendants.

Case No. 3:25-cv-00361-WHO

**STIPULATION TO PRELIMINARY  
INJUNCTION AND SCHEDULING  
AND [~~PROPOSED~~] ORDER AS  
AMENDED**

Hon. William H. Orrick

HUMAN RIGHTS DEFENSE CENTER (“Plaintiff”) and COUNTY OF SONOMA;  
EDDIE ENGRAM and MELISSA PARMENTER (“Defendants”) hereby, through their attorneys,  
stipulate to the following:

1. On January 10, 2025, Plaintiff filed a complaint and request for injunctive relief against Defendants arising out of Defendants’ rejection of the publications sent to incarcerated individuals at the Sonoma County Main Adult Facility (“MADF”).
2. On January 13, 2025, Plaintiff filed a motion seeking to preliminarily enjoin

1 Defendants County of Sonoma, et al., from refusing to deliver publications and correspondence  
2 mailed by Plaintiff to incarcerated persons at the MADF and failing to provide due process to  
3 challenge censorship decisions. The motion was noticed for hearing on February 28, 2025, but  
4 after Defendants and Plaintiff stipulated to continuance to resolve this matter, hearing was reset  
5 for April 23, 2025. See Docket No. 30.

6  
7 3. Plaintiff and Defendants have agreed to the preliminary injunction as set forth  
8 below in the proposed order, which does not apply to MELISSA PARMENTER, the former  
9 Detention Division Operations Captain who has retired, but does apply to any Does 1-10 which  
10 includes any successor in their official capacity.

11 4. Plaintiff and Defendant have agreed to private mediation of this dispute. To allow  
12 time to complete the mediation, Plaintiff and Defendants request the Court to continue the dates  
13 for the following upcoming deadlines:

- 14 a. Rule 26 Disclosures/ ADR Certification/ meet and confer from March 20,  
15 2025, to May 15, 2025
- 16 b. Initial Disclosures from April 3, 2025, to May 22, 2025;
- 17 c. Joint CMC Statement from April 8, 2025, to May 22, 2025;
- 18 d. CMC conference from April 15, 2025, to May 29, 2025;
- 19 e. Defendants' Answer to the Complaint from April 17, 2025 to May 15,2025

20  
21 DATED: March 19, 2025 ROSEN BIEN GALVAN & GRUNFELD, LLP  
22 By: /s/ Sanford Jay Rosen  
23 Standford Jay Rosen  
24 Attorneys for Plaintiff

25 DATED: March 19, 2025 BLUESTONE FAIRCLOTH & OLSON, LLP  
26 By: /s/ Marshall E. Bluestone  
27 Marshall E. Bluestone  
28 Attorneys for Defendants

[PROPOSED] ORDER

Pursuant to the Stipulation of the Parties hereto,

**IT IS HEREBY ORDERED** that Plaintiffs’ Motion for Preliminary Injunctive Relief is GRANTED;

**IT IS FURTHER ORDERED** that Defendants County of Sonoma, Sheriff Eddie Engram, and staff John and Jane Does 1-10, and their successors, officers, agents servants, employees, and attorneys, and all others in active concert or participation with them (hereinafter referred to collectively as “Defendants”), shall not censor or prohibit Plaintiff Human Rights Defense Center to mail the publications and correspondence described in the Complaint herein to named persons incarcerated at the Detention Facility, except for publications or correspondence that may be rejected based upon Defendants’ assertion of a legitimate governmental interest under the *Turner v. Safley*, 482 U.S. 78 (1987) factors.

**IT IS FURTHER ORDERED** that Defendants shall provide adequate written notice and an administrative appeal process to both incarcerated persons and senders when Defendants refuse to deliver publications to named persons incarcerated at the Sonoma County Main Adult Detention Facility.

**IT IS FURTHER ORDERED** that the bond requirement is waived.

No person who has noticed this injunction shall fail to comply with it, nor shall any person subvert the injunction by any sham, indirection or other artifice.

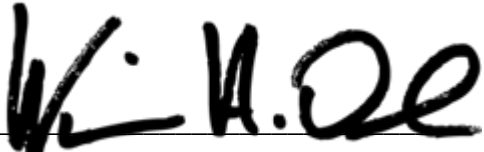
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**IT IS FURTHER ORDERED** that the schedule for the following events be continued as follows:

- a. Rule 26 Disclosures/ ADR Certification/ meet and confer from March 20, 2025, to May 15, 2025
- b. Initial Disclosures from April 3, 2025, to May 22, 2025;
- c. Joint CMC Statement from April 3, 2025, to ~~May 22, 2025~~ May 27, 2025;
- d. CMC conference from April 3, 2025, to ~~May 29, 2025~~ June 3, 2025.
- e. Defendants’ Answer to the Complaint from April 17, 2025 to May 15, 2025

**IT IS SO ORDERED.**

Date: March 19, 2025



Hon. William H. Orrick  
United States District Court  
Northern District of California