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18 SUPERIOR COURT OF CALIFORNIA

19 COUNTY OF ALAMEDA

20 DEPARTMENT OF STATE HOSPITALS  
21 COMPETENCY SERVICES CASES

JCCP No. 5248

22  
23 STEPHANIE STIAVETTI, *et al.*,

Case No. RG15779731

24 Plaintiffs,

**NOTICE OF STIAVETTI PLAINTIFFS'  
OPPOSITION TO PETITION FOR  
COORDINATION**

25 v.

26 STEPHANIE CLENDENIN, AS DIRECTOR  
OF THE CALIFORNIA DEPARTMENT OF  
27 STATE HOSPITALS, *et al.*,

Dept: 21  
Judge: Hon. Evelio Grillo  
Hearing Date: December 7, 2022  
Hearing Time: 10:00 a.m.

28 Defendants.

1 TO THE CHAIRPERSON OF THE JUDICIAL COUNCIL, ALL INTERESTED  
2 PARTIES, AND EACH PARTY’S COUNSEL OF RECORD:

3 PLEASE TAKE NOTICE THAT Plaintiffs Stephanie Stiavetti, Kellie Bock,  
4 Kimberly Bock, Rosalind Randle, Nancy Leiva, American Civil Liberties Union of Northern  
5 California, and American Civil Liberties Union of Southern California in *Stephanie Stiavetti, et*  
6 *al. v. Stephanie Clendenin, as Director of the California Department of State Hospitals, et al.*,  
7 Case No. RG15779731, pending in the Superior Court of Alameda County (the “*Stiavetti*  
8 *Action*”), hereby object to and oppose the Petition for Coordination submitted by Stephanie  
9 Clendenin, as Director of the California Department of State Hospitals (“DSH”), and Nancy  
10 Bargmann, as Director of the California Department of Developmental Services (“DDS”;  
11 together with DSH, “Petitioners”) on July 20, 2022 (the “Petition”).

12 This Opposition is based on this Notice; the accompanying Memorandum of  
13 Points and Authorities; the accompanying Declaration of Emilia Garcia and exhibit thereto; other  
14 relevant records and files in this proceeding and in the *Stiavetti Action*; arguments of counsel at  
15 the scheduled hearing; and such other matters as may be properly considered by the Court.

16  
17 Dated: November 22, 2022

18 */s/ Laura K. Oswell*

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18 SUPERIOR COURT OF CALIFORNIA

19 COUNTY OF ALAMEDA

20 DEPARTMENT OF STATE HOSPITALS  
21 COMPETENCY SERVICES CASES

JCCP No. 5248

22  
23 STEPHANIE STIAVETTI, *et al.*,

Case No. RG15779731

24 Plaintiffs,

**STIAVETTI PLAINTIFFS'  
MEMORANDUM OF POINTS AND  
AUTHORITIES IN OPPOSITION TO  
PETITION FOR COORDINATION**

25 v.

26 STEPHANIE CLENDENIN, AS DIRECTOR  
27 OF THE CALIFORNIA DEPARTMENT OF  
STATE HOSPITALS, *et al.*,

Dept: 21  
Judge: Hon. Evelio Grillo  
Hearing Date: December 7, 2022  
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28 Defendants.

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1 **INTRODUCTION**

2 The *Stiavetti* Plaintiffs<sup>1</sup> oppose the Petition for Coordination submitted by  
3 Defendants Stephanie Clendenin, as Director of the California Department of State Hospitals  
4 (“DSH”), and Nancy Bargmann, as Director of the California Department of Developmental  
5 Services (“DDS”; together with DSH, “Petitioners”) on July 20, 2022 (the “Petition”).

6 Individuals with criminal charges in California who are found incompetent to  
7 stand trial (“IST defendants”) must be restored to competency before their criminal proceedings  
8 can resume. DSH is the California state agency charged with treating such individuals with the  
9 goal of restoring them to competency. For many years, however, IST defendants have  
10 experienced months-long delays before they are admitted for treatment in a DSH facility. These  
11 delays prompted the *Stiavetti* Plaintiffs, in July 2015, to file a lawsuit alleging that DSH’s  
12 admission delays violated IST defendants’ constitutional due process rights. This Court (Smith,  
13 J.) agreed and, in April 2019, issued a judgment finding that “[c]onstitutional due process  
14 requires that DSH must commence substantive services to restore an IST defendant to  
15 competency within 28 days of the transfer of responsibility for an IST defendant to DSH.” DSH  
16 appealed the judgment, and the Court of Appeal affirmed this Court’s decision, finding that  
17 Petitioners “have systematically violated the due process rights of all IST defendants in  
18 California” by failing to admit IST defendants within 28 days. *See Stiavetti v. Clendenin*, 65  
19 Cal. App. 5th 691, 695 (2021).

20 Now, three and a half years after this Court’s judgment in *Stiavetti* and nearly a  
21 year and a half after the Court of Appeal affirmed that judgment, DSH is nowhere close to  
22 meeting this 28-day admission deadline. Since this Court’s judgment issued in 2019, the average  
23 wait time for an IST defendant to be admitted to a state hospital has more than doubled. These  
24 increased wait times severely and tangibly harm IST defendants, nearly all of whom languish in  
25 county jail until DSH admits them for treatment. As just one illustration of these harms, DSH

26  
27 <sup>1</sup> The Plaintiffs in the *Stiavetti* action are Stephanie Stiavetti, Kellie Bock, Kimberly Bock,  
28 Rosalind Randle, Nancy Leiva, American Civil Liberties Union of Northern California, and  
American Civil Liberties Union of Southern California (collectively, “*Stiavetti* Plaintiffs”).

1 has recently confirmed that since January 2019, at least 21 IST defendants have died before they  
2 could be admitted for treatment. Faced with evidence of these unjustified delays and the  
3 resultant harms to IST defendants, over the past several years courts across the state have ordered  
4 DSH to admit IST defendants for treatment in a timely, constitutional manner. In many cases,  
5 courts have found good cause to sanction DSH for its admission delays, and these sanctions can  
6 have the actual effect of expediting such admissions.

7           Now, DSH seeks to coordinate all proceedings across the state that challenge  
8 DSH’s long admission delays—including *habeas corpus* petitions and cases involving orders to  
9 show cause (“OSC”) why DSH should not be sanctioned for admission delays. By way of a  
10 separate motion to amend the *Stiavetti* judgment, DSH is also seeking to remove all court-  
11 ordered admission deadlines in that case until February 27, 2024. Together, the Petition and  
12 DSH’s motion to amend the *Stiavetti* judgment would, in effect, eliminate any ability for  
13 individual IST defendants to enforce a court-ordered admission deadline for at least the next 15  
14 months. This would have real detrimental effects on IST defendants, who are at a heightened  
15 risk of violence and self-harm while they languish in county jails that lack the facilities and  
16 mental health resources to treat them effectively. This Court should deny the Petition for at least  
17 three overarching reasons:

18           *First*, the Petition’s primary purpose is to suspend, for at least the next 15 months,  
19 IST defendants’ ability to seek individualized relief requiring DSH to admit them within the  
20 constitutionally-required 28-day period. This would deprive IST defendants of a crucial tool to  
21 vindicate their constitutional right not to be subjected to the harmful conditions they face in  
22 county jails any longer than is necessary.

23           *Second*, Petitioners have failed to demonstrate that coordination is appropriate  
24 here under the standard set forth in California Code of Civil Procedure Sections 404 and 404.1.  
25 DSH now acknowledges that every one of the cases other than *Stiavetti* is moot. (Nov. 21, 2022  
26 Declaration of Colin D. Schoell in Support of Petition for Coordination (“Nov. Schoell Decl.”) ¶  
27 4). There are no longer any “pending” cases to be coordinated with *Stiavetti*. Moreover, none of  
28 the proposed included proceedings is a “civil action,” DSH has failed to show that any of the

1 cases other than *Stiavetti* are complex, and coordination would not promote the ends of justice.  
2 Because these three prerequisites for coordination are not met, the Petition should be denied on  
3 this basis alone.

4 *Third*, any attempt to coordinate the included *habeas corpus* and OSC  
5 proceedings in Alameda County would face procedural hurdles and significant logistical  
6 challenges that would undermine any potential efficiencies that could be gained by having a  
7 single coordination judge preside over all of these matters. The burden involved in having one  
8 judge decide all DSH waitlist-related proceedings from across the state—each involving unique  
9 individual- and county-specific factual circumstances and different counsel and witnesses, and  
10 some of which may involve emergency requests—makes coordination administratively  
11 impractical. Furthermore, IST defendants and their counsel would be unduly prejudiced if they  
12 were required to travel to Alameda County from counties all over the state to vindicate their  
13 constitutional rights.

#### 14 **FACTUAL BACKGROUND**

##### 15 **A. California’s Statutory Scheme for IST Defendants**

16 A person cannot be tried or sentenced while mentally incompetent. *People v.*  
17 *Rodas*, 6 Cal. 5th 219, 230–31 (2018). “A defendant is mentally incompetent . . . if, as a result of  
18 mental health disorder or developmental disability, the defendant is unable to understand the  
19 nature of the criminal proceedings or to assist counsel in the conduct of a defense in a rational  
20 manner.” Pen. Code § 1367(a). If a doubt arises as to a defendant’s competence, the Court must  
21 suspend the criminal proceedings and appoint experts to evaluate the defendant. *See id.*  
22 §§ 1368(a), 1369(a). These experts must then evaluate the defendant and write reports setting  
23 forth their findings and conclusions. If the court determines that the defendant is competent, the  
24 criminal process resumes. *See id.* §§ 1369, 1370(a). If the court finds the defendant  
25 incompetent, it commits her or him either to DSH or to DDS for evaluation and treatment. *See*  
26 §§ 1370, 1370.1. IST defendants who are incompetent because of a mental health disorder are  
27 committed to DSH under Section 1370; and those who have a developmental disability are  
28 committed to DDS under Section 1370.1. *See* § 1367(b). This process alone “routinely” takes

1 two to six weeks, even if the parties stipulate that an evidentiary hearing is not needed. *See*  
2 Judicial Council of California, Benchguide 63: Competence to Stand Trial § 62.25 (2022 ed.).

3           Throughout the entire process described in the preceding paragraph, most IST  
4 defendants remain confined in a county jail or other custodial setting. If there is no space  
5 immediately available to treat an IST defendant who has been committed to DSH, the individual  
6 is added to a statewide waitlist maintained by DSH and must continue to wait in jail—or  
7 wherever they are being confined—until they are admitted. (Petition at 9–10.) According to  
8 DSH, IST defendants are “placed on the waitlist in order of their commitment date” (*id.* at 10),  
9 and DSH regulations specify that IST defendants are admitted from the waitlist on a first-in,  
10 first-out basis. Cal. Code Regs., tit. 9, § 4710. If, however, a particular IST defendant is  
11 experiencing acute psychiatric symptoms, a clinician from the committing county can request a  
12 psychiatric acuity review, and DSH’s medical director will determine whether the IST  
13 defendant’s psychiatric acuity warrants admitting the individual on an expedited basis. *Id.*  
14 § 4717.

15           **B. Delays in Admission Harm IST Defendants**

16           Prolonged stays in jails pose a threat to IST defendants’ physical and  
17 psychological well-being and may impede their restoration to competency. Dr. Terry Kupers—a  
18 clinical psychiatrist with more than 40 years of experience that was retained by the *Stiavetti*  
19 Plaintiffs as an expert on correctional mental health—submitted an expert report in which he  
20 described how IST defendants receive inadequate care for their mental illnesses in jail, are likely  
21 to experience prolonged isolation, and are at risk of being victimized by other inmates and  
22 experiencing the use of force by jail staff. (Jan. 25, 2018 Declaration of Michael P. Murtagh in  
23 Support of *Stiavetti* Plaintiffs’ Motion for Peremptory Writ of Mandate (“Murtagh Decl.”), Ex.  
24 44, Expert Report of Terry A. Kupers, M.D. (“Kupers Report”).)<sup>2</sup> Based on his decades of  
25 experience as a clinical psychiatrist and his first-hand observations from visiting jail facilities  
26

27 \_\_\_\_\_  
28 <sup>2</sup> Unless otherwise indicated, citations to court filings are to documents filed on the docket  
for *Stiavetti v. Clendenin*, No. RG15779731 (Cal. Super. Ct., filed July 29, 2015).

1 throughout California (both in connection with the *Stiavetti* case<sup>3</sup> and throughout his career),  
2 Dr. Kupers opined that “[j]ail crowding, the threat of violence, the culture of punishment that  
3 permeates the facilities, and the relative inadequacy of programs and treatment have a very  
4 detrimental effect on the mental status of incompetent prisoners, and on the ability to participate  
5 effectively in competency restoration.” (*Id.* at 32.) DSH’s own employees have likewise  
6 acknowledged the problems with allowing IST defendants to languish in county jails for  
7 extended periods; for example, Dr. Patricia Tyler—the Medical Director at Napa State  
8 Hospital—testified in her deposition in *Stiavetti* that “most jails, with some exceptions, are not  
9 providing what mental health patients are constitutionally entitled to, which is adequate care  
10 consistent with the community standard of care for th[e] condition that they have.” (Murtagh  
11 Decl., Ex. 23, Deposition Transcript of Patricia Tyler, at 138:8–12.)

12           Even relatively short stays in a county jail can have severe consequences for IST  
13 defendants with a mental illness. For example, Dr. Kupers described in his report how IST  
14 defendants are often subjected to solitary confinement and other forms of isolation that can  
15 worsen their psychiatric condition and cause them to become suicidal. (Kupers Report at 18–  
16 22.) According to Dr. Kupers, even “relatively stable-appearing prisoners” can experience a  
17 psychotic breakdown or become “seriously suicidal after being in solitary confinement for only a  
18 few days.” (*Id.* at 22.) In light of the harmful effects of the jail environment and the often-  
19 inadequate mental health treatment available in California jails, Dr. Kupers concluded that “the  
20 longer an individual suffering from serious mental illness is consigned to jail . . . the worse his or  
21 her condition, disability and prognosis, and therefore the less likely there will be a restoration of  
22 competence (or, in a certain proportion of cases, the longer it will take for competence to be  
23 restored.)” (*Id.* at 33.)

24  
25 \_\_\_\_\_  
26 <sup>3</sup> In connection with preparing his report in *Stiavetti*, Dr. Kupers toured five jail facilities in  
27 Lake, Los Angeles, San Diego, and Solano Counties, including a tour of San Diego’s jail-based  
28 competency training program. At each of these jails, Dr. Kupers observed the facilities where  
IST defendants and other mentally ill detainees are housed and where they receive medical  
treatment, and spoke with correctional staff and mental health care staff. (Kupers Report at 4 &  
App’x D.)

1           **C. California Courts’ Long History of Enforcing IST Defendants’**  
2           **Constitutional Right to Prompt Competency Restoration**

3           Because an IST defendant’s commitment results in the loss of liberty, “due  
4 process requires that the nature and duration of commitment bear some reasonable relation to the  
5 purpose for which the individual is committed.” *Jackson v. Indiana*, 406 U.S. 715, 738 (1972).  
6 This means that after criminal proceedings are suspended, any “continued commitment must be  
7 justified by progress toward that goal” of competency restoration. *Id.* Allowing IST defendants  
8 to languish in jail during this period, without competency-restoration treatment, bears no relation  
9 to the purpose of restoring competency and is not justified by progress toward that purpose.  
10 Although it necessarily takes some time to arrange to provide competency treatment following  
11 the commitment order, any time beyond what is reasonably necessary is unconstitutional. *See,*  
12 *e.g., Oregon Advocacy Center v. Mink*, 322 F.3d 1101, 1122 (9th Cir. 2003) (“Holding [IST]  
13 defendants in jail for weeks or months violates their due process rights because the nature and  
14 duration of their incarceration bear no reasonable relation to the evaluative and restorative  
15 purposes for which courts commit those individuals.”).

16           Due to the long wait times that IST defendants committed to DSH have  
17 historically faced, for more than a decade California superior courts have issued standing orders  
18 to protect IST defendants’ constitutional right to prompt treatment, imposing specific admission  
19 time limits on DSH ranging from 14 to 60 days. *See, e.g., In re Loveton*, 244 Cal. App. 4th  
20 1025, 1044–45, 1047 (2016) (affirming a 60-day deadline in Contra Costa County and trial  
21 courts’ authority to issue standing orders).<sup>4</sup> And numerous superior courts have found good  
22 cause to sanction DSH for its admission delays. *See, e.g., People v. Kareem A.*, 46 Cal. App. 5th  
23 58, 68–69, 79–81 (2020) (affirming four separate orders sanctioning DSH for a total of \$370,500

24 <sup>4</sup> *See also* Order, *In re Nick Delato*, No. SF123635A (Cal. Super. Ct. Jan. 9, 2014) (30-day  
25 deadline in San Joaquin County), *rev’d, People v. Delato*, 2015 WL 6438758, at \*6 (Cal. Ct.  
26 App. Oct. 23, 2014) (unpublished) (remanding due to changes in Cal. Penal Code § 1370 that  
27 altered admissions procedures); Order re Contempt and Motion to Modify Prior Order, *In re*  
28 *David Osburn*, No. 05F09064 (Cal. Super. Ct. Oct. 18, 2013) (14-day deadline in Sacramento  
County), *rev’d, People v. Brewer*, 235 Cal. App. 4th 122, 137 (2015) (remanding due to changes  
in law); Stipulation and Order re Placement of Persons Deemed Incompetent to Stand Trial, *In re*  
*Peter Lawrence Hofman*, No. HC 07-28 (Cal. Super. Ct. Mar. 12, 2008) (30-day deadline in  
Yolo County), *rev’d, People v. Yanez*, 2015 WL 152404, at \*9 (Cal. Super. Ct. Apr. 3, 2015)  
(unpublished) (remanding due to changes in law).

1 for failing to admit 247 IST defendants in Los Angeles County within 60 days of commitment,  
2 observing that “DSH has had over a decade to evolve in order to meet the rising demand of IST  
3 beds, and yet the IST waitlist has continued to grow”); *People v. Aguirre*, 64 Cal. App. 5th 652,  
4 657–58, 670 (2021) (affirming omnibus order imposing \$34,000 in sanctions for failing to admit  
5 31 IST defendants in San Joaquin County within 60 days, in light of “the longstanding nature of  
6 this issue, the absence of substantial reduction in wait times during the years the trial court has  
7 been presiding over litigation concerning this issue, and the importance of the rights at stake”).<sup>5</sup>

#### 8 **D. The *Stiavetti* Action**

9 On July 29, 2015, the *Stiavetti* Plaintiffs filed a Petition for Writ of Mandate and  
10 Complaint for Declaratory and Injunctive Relief (“Complaint”) in response to the months-long  
11 admission delays that were then plaguing DSH and DDS. The *Stiavetti* lawsuit included three  
12 related substantive causes of action for violations of IST defendants’ state and federal due  
13 process and of the state right to a speedy trial. (*See* Complaint, at 13–14.) All three claims  
14 sought the same relief—a declaration that the existing wait times are unconstitutional, and an  
15 order requiring DSH and DDS to admit IST defendants “within a constitutionally permissible  
16 time following the order of commitment.” (*Id.* at 15.)

17 On April 19, 2019, the Court (Smith, J.) entered a Judgment that provided,  
18 “Constitutional due process requires that DSH must commence substantive services to restore an  
19 IST defendant to competency within 28 days of the transfer of responsibility for an IST  
20 defendant to DSH.” (Judgment at 3.) In the accompanying Order, the Court explained that it  
21 was taking “administrative feasibility into account by providing DSH and DDS with a period of  
22 time to meet the constitutional deadlines.” (Apr. 19, 2019 Amended Order Granting in Part  
23

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24 <sup>5</sup> *See also, e.g.*, Order Imposing Monetary Sanctions Pursuant to CCP Sections 177.5,  
25 *People v. Cuellar*, No. FCR357677 (Cal. Super. Ct. Mar. 1, 2022) (July 20, 2022 Petitioners’  
26 Request for Judicial Notice in Support of Petition for Coordination (“RJN”) Ex. E, at 64, JCCP  
27 No. 5248) (\$2,500 in sanctions against DSH); *People v. Hooper*, 40 Cal. App. 5th 685 (2019)  
28 (upholding \$16,500 sanction against DSH for noncompliance with *Loveton*’s 60-day deadline);  
Omnibus Order, *People v. Ballard-Grajada*, No. 02-326721-8 (Cal. Super. Ct. Feb. 26, 2019)  
(RJN Ex. K, at 232) (\$12,150 in sanctions for noncompliance with *Loveton*); Amended Decision  
on Sanctions, *People v. Czirban*, No. 5-151662-4 (Cal. Super. Ct. Aug. 16, 2017) (RJN Ex. G, at  
102) (\$17,400 in sanctions for noncompliance with *Loveton*).



1 Petition for Writ of Mandate (“Order”), at 44.) In response to DSH and DDS’s concerns that “it  
2 would be impossible for the state agencies to comply with a court order directing them to within  
3 6 months commence substantive services for all IST defendants within 60 days from the transfer  
4 of responsibility date,” the Court provided 12 months for DSH and DDS to begin admitting IST  
5 defendants within 60 days. (*Id.* at 45–46.) The Court further explained that “the Court of  
6 Appeal issued *Loveton*, 244 Cal. App. 4th 1025, on 2/11/16, which means that DSH and DDS  
7 have already been working for three years to ensure that they commence services to IST  
8 defendants within 60 days.” (*Id.*) On April 24, 2019, the Court issued an approved-as-to-form  
9 Writ of Mandate that provided the same implementation schedule as the Judgment. The Court of  
10 Appeal denied Defendants’ appeal on June 15, 2021, and the Supreme Court denied Defendants’  
11 petition for review on August 25, 2021. The case was remitted to this Court on August 27, 2021.

12 On remand, Defendants first requested a COVID-related “pause” of the court-  
13 ordered interim admission deadlines, citing “the pandemic’s indisputable impact on admissions.”  
14 (Nov. 30, 2021 Defendants’ CMC Statement, at 4.) In response, this Court extended the progress  
15 points by 861 days; with this extension, the first interim deadline was scheduled to take effect on  
16 August 27, 2022—12 months after remittitur issued. (Dec. 16, 2021 Amended Judgment  
17 (“Amended Judgment”), at 4.)

18 On June 27, 2022, DSH moved to further modify the Court’s injunction to remove  
19 all the interim progress points, seeking to leave only the February 27, 2024, 28-day admission  
20 deadline in place. DSH cited the impact of COVID-19 on its operations as a material change in  
21 facts that justifies modification of the writ. (DSH Memorandum of Points and Authorities in  
22 Support of Its Motion for Modification (“Motion for Modification”), at 23.)

### 23 **E. DSH’s Continued Admission Delays**

24 Despite the more than three-and-a-half years that have passed since the Court first  
25 entered judgment in *Stiavetti*, DSH is far from being in compliance with the constitutionally  
26 required 28-day admission deadline. Nor is it anywhere close to complying with the interim 60-  
27 day admission deadline that has been in effect since August 27, 2022. In a report filed with the  
28 *Stiavetti* court on October 27, 2022, DSH admitted that during the three-month period ending on

1 August 27, 2022, the average time an IST defendant waited to be admitted for competency  
2 restoration treatment was 116 days—nearly four months. (See Respondent Clendenin’s Post-  
3 Judgment Status Report for Progress Point One, Ex. A at 1.) Because this is only an average  
4 figure, many IST defendants wait far longer to be admitted for treatment; DSH’s reporting  
5 indicates that over the last 15 months, some IST defendants have waited *nearly a year or more* to  
6 be admitted to a DSH facility for treatment. (See, e.g., *id* at 1, 9 (indicating one IST defendant  
7 waited 339 days to be admitted to a state hospital); *id.* at 8 (showing that one individual with  
8 extenuating “[m]edical [c]ircumstances” waited 511 days—about *17 months*—for treatment).)  
9 Indeed, during the year-long period ending on August 27, 2022 covered by DSH’s reporting,  
10 DSH has admitted only 11.7% of IST defendants within 60 days; more than a quarter of them  
11 waited longer than 150 days. (See *id.* at 1.)

12 IST defendants have experienced severe negative consequences because of these  
13 extended delays. For example, DSH recently confirmed, in a November 16, 2022 response to a  
14 public records request, that since January 2019 at least 21 IST defendants died while awaiting  
15 admission to a DSH facility.<sup>6</sup> (See Declaration of Emilia Garcia ¶ 4 & Ex. 1.) Indeed, even  
16 much shorter wait times would still cause unacceptable harms to IST defendants. According to  
17 Dr. Kupers, even a delay of 60 days—half as long as DSH’s current average wait time—“is far  
18 too long for incompetent individuals to remain in harmful jail conditions with limited mental  
19 health treatment.” (Kupers Report at 33.)

#### 20 F. DSH’s Petition

21 Due to the continued lengthy wait times, individual IST defendants across the  
22 state have initiated dozens of *habeas corpus* and OSC proceedings to seek redress for DSH’s  
23 violations of their due process rights. (See July 20, 2022 Declaration of Sean Mark Rashkis in

24 \_\_\_\_\_  
25 <sup>6</sup> Although DSH did not state the causes of these individuals’ deaths, other reported  
26 incidents of IST defendants who died while awaiting admission for treatment suggest that some  
27 of these deaths could have been prevented if the IST defendants were admitted more promptly.  
28 For example, in a tragic example from Alameda County in 2016, an IST defendant who had been  
waiting months to be transferred to the state hospital was killed in his cell by another inmate.  
(See Murtagh Decl. Ex. 24, Kimberly Veklerov, *Santa Rita Jail inmate, allegedly killed by  
cellmate, identified*, SFGATE (Oct. 12, 2016), [http://www.sfgate.com/crime/article/Officials-  
identify-inmate-killed-by-cellmate-at-9967122.php](http://www.sfgate.com/crime/article/Officials-identify-inmate-killed-by-cellmate-at-9967122.php).)

1 Support of Defendants’ Petition for Coordination (“Rashkis Decl.”) ¶ 4, JCCP No. 5248.) On  
2 July 20, 2022, DSH sought the Judicial Council’s approval to coordinate all of these IST  
3 sanctions proceedings before this Court. The Petition identified approximately 77 such  
4 proceedings that have been filed across 11 counties. According to DSH, the purpose of its  
5 Petition is to “prevent the included actions . . . from interfering with the statewide enforcement  
6 proceedings occurring in *Stiavetti*.” (See July 20, 2022 Memorandum of Points and Authorities  
7 in Support of Motion for Stay Pending Coordination, at 4, JCCP No. 5248.)

## 8 ARGUMENT

### 9 **I. Petitioners Seek Coordination Primarily in Order to Limit the Imposition of 10 Sanctions for Acts that the Court of Appeal Has Found to Be Unconstitutional.**

11 In upholding the judgment against DSH in *Stiavetti*, the Court of Appeal held that  
12 DSH has “systematically violated the due process rights of all IST defendants in California by  
13 failing to commence substantive services designed to return those defendants to competency  
14 within 28 days” of the date that responsibility for the IST defendant transferred to DSH. *Stiavetti*  
15 v. *Clendenin*, 65 Cal. App. 5th 691, 695 (2021). That conclusion was based, in part, on evidence  
16 that “IST defendants suffer harm when incarcerated for a substantial period of time in jail before  
17 transfer to a facility for treatment, which affects the likelihood of their return to competence.”  
18 *Id.* at 702. This evidence included the expert report of Dr. Terry Kupers. (See Kupers Report at  
19 1–2 & App’x A.) Dr. Kupers concluded, among other things, that “the longer an individual  
20 suffering from serious mental illness is consigned to jail, likely including time in isolation, and is  
21 not provided adequate mental health treatment, the worse his or her condition, disability and  
22 prognosis, and therefore the less likely there will be a restoration of competence (or, in a certain  
23 proportion of cases, the longer it will take for competence to be restored).”<sup>7</sup> *Stiavetti*, 65 Cal.  
24 App. 5th at 702 (quoting Kupers Report at 33.)

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25 <sup>7</sup> Several federal courts, in ruling on cases involving delays in admitting IST defendants for  
26 treatment in other states, have similarly concluded that IST defendants suffer harm while waiting  
27 in jail for competency restoration services to commence. See *Trueblood v. Wash. State Dep’t of*  
28 *Soc. & Health Servs.*, 101 F. Supp. 3d 1010, 1013 (W.D. Wash. 2015) (observing that jails “are  
not designed as therapeutic environments, and they are not equipped to manage mental illness or  
keep those with mental illness from being victimized by the general population of inmates”),  
*modified*, 2016 WL 4533611 (W.D. Wash. Feb. 8, 2016), and *rev’d in part on other grounds*,  
822 F.3d 1037 (9th Cir. 2016); *Or. Advocacy Ctr. v. Mink*, 322 F.3d 1101, 1122 (9th Cir. 2003)

1 Faced with evidence of DSH’s extraordinary, prolonged delays in admitting IST  
2 defendants for competency restoration treatment, courts across the state have ordered sanctions  
3 against DSH based on its violations of IST defendants’ constitutional rights. *See supra* note 5  
4 and accompanying text. Sanctions have, in some of these cases, followed deaths or other severe  
5 harms suffered by IST defendants while they were in custody awaiting admission to DSH. (*See,*  
6 *e.g.*, Oct. 27, 2022 Objection to Petition for Coordination on Behalf of Real Parties in Interest to  
7 Contempt and Competency Proceedings in the Santa Barbara County Superior Court Which Are  
8 Now Final (“Santa Barbara PD Objection”), at 6, JCCP No. 5248.) And importantly, in some  
9 cases sanctions have had the actual effect of expediting IST defendants’ transfers from county  
10 jails to DSH facilities. *See, e.g., id.; In re Loveton*, 244 Cal. App. 4th 1025, 1034 n.6 (2016)  
11 (noting that DSH admitted an IST defendant on a prioritized basis “[b]ecause of the OSC that  
12 had issued as to” the IST defendant). For many of these IST defendants, sanctions are the *only*  
13 tool available to expedite their transfer to DSH treatment.

14 Through this Petition, DSH seeks to take away that tool. Specifically, DSH seeks  
15 to coordinate all OSC proceedings across the state that “challeng[e] DSH’s waitlist for IST  
16 criminal defendants and seek[] to enforce DSH’s compliance with court-ordered deadlines to  
17 commence substantive competency restoration services,” removing all such cases to be heard by  
18 a single judge in this Court. (*See Rashkis Decl.* ¶ 4.) Coordination will have the effect of  
19 staying all of the included cases, except as this Court orders. *See Cal. Rules of Court 3.529(b).*  
20 DSH has separately moved to remove all of the *Stiavetti* court-ordered admission deadlines until  
21 February 27, 2024. (*See Motion for Modification*, at 4–5) The combined effect of this would be  
22 to eliminate *all* avenues for IST defendants throughout California to enforce a court order  
23 requiring DSH to admit an IST defendant to one of its facilities by a date certain. The Court  
24 should reject DSH’s attempt to exempt itself from having to obey the constitution and respect  
25 IST defendants’ due process rights for the next 15 months or more.

26 \_\_\_\_\_  
27 (“County jails are simply unable to provide restorative treatment, and the jails’ disciplinary  
28 systems may exacerbate the defendants’ mental illnesses.”); *Or. Advocacy Ctr. v. Mink*, 2002  
WL 35578910, at \*6 (D. Or. May 10, 2002) (“Even short periods of incarceration of these  
persons can cause cognizable harm.”), *aff’d*, 322 F.3d 1101.

1 **II. The Proceedings that Petitioners Seek to Coordinate Are Not Appropriate for**  
2 **Coordination.**

3 California Code of Civil Procedure Section 404 lays out four requirements for the  
4 coordination of actions pending in different courts: the actions to be coordinated must be  
5 “[1] civil actions [2] sharing a common question of fact or law” that are “[3] complex, as defined  
6 by the Judicial Council,” and that “[4] meet the standards specified in Section 404.1.”  
7 Section 404.1, in turn, provides that coordination “is appropriate if one judge hearing all of the  
8 actions for all purposes in a selected site or sites will promote the ends of justice taking into  
9 account” a list of enumerated factors. Civ. Proc. Code § 404.1. Although at least some of these  
10 matters may involve common questions of law or fact, none of the other three requirements for  
11 coordination are met here.

12 **A. Coordination Is Inappropriate Because None of the Included Actions Is a**  
13 **“Civil Action.”**

14 Since 1872, “judicial remedies have been divided into classes: actions and special  
15 proceedings.” *People v. Yartz*, 37 Cal. 4th 529, 536 (2005). Section 404 authorizes only the  
16 coordination of “civil actions,” and the remainder of the coordination statute consistently refers  
17 to “civil actions” and “actions.” *See* Code Civ. Proc. §§ 404.1, 404.2, 404.3, 404.4, 404.5, 404.7.  
18 None of the 77 proceedings that Petitioners seek to coordinate with the *Stiavetti* litigation are  
19 eligible for coordination because those proceedings are not “civil actions.”

20 Petitioners never even claim that the enforcement proceedings they seek to  
21 coordinate *are* civil actions. Instead, Petitioners *acknowledge* that the cases are “special  
22 proceedings” and describe them as enforcement proceedings arising out of individual criminal  
23 cases, quoting cases acknowledging that such matters are special proceedings. (*See* Petition at  
24 16.)<sup>8</sup> Contempt and other sanctions proceedings like these are not civil actions. *See* Code Civ.  
Proc. §§ 22, 23; *Leonis v. Superior Court*, 38 Cal. 2d 527, 531 (1952); *People v. Cole*, 165 Cal.

25 <sup>8</sup> *See also* July 20, 2022 Declaration of Colin D. Schoell in Support of Defendants’ Petition  
26 for Coordination (“July Schoell Decl.”) ¶ 8, JCCP No. 5248; Rashkis Decl. ¶ 4 (describing the  
27 77 other proceedings as “OSC proceedings challenging DSH’s waitlist for IST criminal  
28 defendants and seeking to enforce DSH’s compliance with court-ordered deadlines to commence  
substantive competency restoration services”); *id.* ¶ 3 (describing “Order to Show Cause  
proceedings . . . which sought to hold DSH in contempt for patients awaiting competency  
restoration”).

1 App. 4th Supp. 1, 13 (2008). Thus, to the extent that these proceedings are distinct from the IST  
2 defendants’ underlying criminal cases for the purposes of coordination, they are special  
3 proceedings. Moreover, it appears that DSH is attempting to include *habeas corpus* petitions in  
4 their request for coordination, even though these are special proceedings of a *criminal* nature.  
5 *See Mendoza v. Superior Court*, 65 Cal. App. 5th 988, 1002 (2021).

6 Thus, the cases DSH seeks to coordinate with *Stiavetti* do not even meet  
7 Section 404’s basic threshold requirement for coordination. This is not a mere formality.  
8 Although civil actions are all governed by the same provisions of the Code of Civil Procedure,  
9 the various types of special proceedings at issue—*habeas*, *contempt*, and others—are not. *See*  
10 *Agric. Lab. Rels. Bd. v. Tex-Cal Land Mgmt., Inc.*, 43 Cal. 3d 696, 707 (1987). The coordination  
11 statutes are simply not intended to apply to such disparate cases.

12 **B. DSH Has Failed to Show that Any of the Cases Other than *Stiavetti* Are**  
13 **Complex.**

14 Coordination is authorized only if the Court determines that “the actions are  
15 complex,” as defined by the Judicial Council. Code Civ. Proc. § 404. To submit its petition, a  
16 party requesting coordination must submit “a declaration stating facts showing that the actions  
17 are complex.” *Id.* The Judicial Council defines a “complex” case as one that “requires  
18 exceptional judicial management to avoid placing unnecessary burdens on the court or the  
19 litigants and to expedite the case, keep costs reasonable, and promote effective decision making  
20 by the court, the parties, and counsel.” Cal. Rules of Court 3.400(a). In determining whether a  
21 case is complex, courts consider whether the action is likely to involve “(1) Numerous pretrial  
22 motions raising difficult or novel legal issues that will be time-consuming to resolve; (2)  
23 Management of a large number of witnesses or a substantial amount of documentary evidence;  
24 (3) Management of a large number of separately represented parties; (4) Coordination with  
25 related actions pending in one or more courts in other counties, states, or countries, or in a  
26 federal court; or (5) Substantial postjudgment judicial supervision.” Cal. Rules of Court  
27 3.400(b).

28 DSH has failed to show that any of the 77 proceedings sought to be coordinated  
other than *Stiavetti* are complex. There is no indication that any of the cases aside from *Stiavetti*

1 has been classified as complex. DSH’s own evidence shows that every one of these cases  
2 involves only a single IST defendant. (*See* Rashkis Decl. Ex. A.) Although DSH cites to a few  
3 *other* cases involving issues of sanctions against DSH that “spanned months,” those were all  
4 consolidated proceedings involving eight or more IST defendants; one of them involved hearings  
5 relating to 247 IST defendants. (*See* Petition at 17.)<sup>9</sup> Most of them occurred years ago. (*See*  
6 RJN Ex. G, at 100 (2017 order); *id.* Ex. I, at 160 (2018 order); *id.* Ex. J, at 195 (2017 order); *id.*  
7 at 293 (Ex. N) (2018 order).) These are plainly outliers: DSH appears in hundreds of  
8 competency proceedings a year, but cites fewer than 10 cases in the last five years as supposedly  
9 being complex. (*Compare* Rashkis Decl. ¶ 3 *with* Petition at 17–18.) DSH is not asking to  
10 consolidate any of these cases, probably because they are long over. (*Compare* RJN *with*  
11 Rashkis Ex. A.)<sup>10</sup> Even if these outlier cases cited by DSH were in fact complex (though most of  
12 them seem no more complex than an ordinary civil matter), the mere fact that DSH has appeared  
13 in a few cases involving multiple IST defendants—out of the hundreds of enforcement actions  
14 against it over the last several years—does not indicate that the 77 single-IST-defendant cases  
15 here at issue (or the others that DSH would seek to coordinate moving forward) are also  
16 complex.

17           Aside from these cherry-picked consolidated cases, the only evidence purporting  
18 to show that any of the 77 single-IST-defendant cases actually at issue are complex is a single  
19 paragraph in a declaration by the attorney who filed the Petition, opining that enforcement  
20 proceedings “generally” involve voluminous evidence. (*See* July Schoell Decl. ¶ 10.) This  
21 claim—made without any indication of how the declarant came to this conclusion, much less any  
22 evidence to support it—is inadmissible.<sup>11</sup> Even if it were admissible, this generalized statement  
23

24 \_\_\_\_\_  
25 <sup>9</sup> There is no evidence to support DSH’s claim that these cases “required dozens of hours  
of testimony.” (*Cf.* Petition at 17.)

26 <sup>10</sup> The single case in DSH’s RJN that it seeks to consolidate, *Cuellar*, No. FCR357677,  
27 involved nothing more than a single hearing. (*See* RJN Ex. E, at 64.)

28 <sup>11</sup> *See San Diegans for Open Gov’t v. San Diego State Univ. Rsch. Found.*, 13 Cal. App. 5th  
76, 108 (2017). The general claim of personal knowledge in the beginning of the declaration is  
inadequate. *See Snider v. Snider*, 200 Cal. App. 2d 741, 754 (1962) (“Where the facts stated do  
-20-

1 is completely inadequate to meet DSH’s burden to present “facts showing that the actions are  
2 complex.” Code Civ. Proc. § 404.

3 **C. Coordination Would Not Promote the Ends of Justice.**

4 In determining whether coordination would “promote the ends of justice,” Civil  
5 Procedure Section 404.1 directs courts to consider a list of seven enumerated factors:

- 6 • “whether the common question of fact or law is predominating and significant to  
7 the litigation;
- 8 • “the convenience of parties, witnesses, and counsel;
- 9 • “the relative development of the actions and the work product of counsel;
- 10 • “the efficient utilization of judicial facilities and manpower;
- 11 • “the calendar of the courts;
- 12 • “the disadvantages of duplicative and inconsistent rulings, orders, or judgments;  
13 and,
- 14 • “the likelihood of settlement of the actions without further litigation should  
15 coordination be denied.”

16 Five of these seven factors strongly counsel against coordinating any of the  
17 proposed included actions, and the remaining factors are either neutral or are outweighed by the  
18 five factors going against coordination.

19 **1. There Is No Risk of Duplicative or Inconsistent Rulings.**

20 The Petition is based on the false premise that superior court orders requiring  
21 DSH to admit IST defendants within a shorter time than the 60-day compliance deadline  
22 currently in effect in the *Stiavetti* action would conflict with the Amended Judgment in *Stiavetti*.  
23 (*See* Petition at 23.) But a court order setting an admission deadline for a particular IST  
24 defendant, or imposing sanctions on DSH for failing to admit a specific IST defendant within a  
25 particular time, does not conflict with the judgment in *Stiavetti* because that judgment does no  
26 \_\_\_\_\_  
27 not themselves show [personal knowledge], such bare statement of the affiant has no redeeming  
28 value and should be ignored.”).



1 more than impose “a 28-day constitutional *outer limit* for commencement of substantive  
2 services.” *Stiavetti v. Clendenin*, 65 Cal. App. 5th at 737–38 (emphasis added). In other words,  
3 the *Stiavetti* judgment sets a ceiling for admission, not a floor.

4           If specific facts concerning a particular IST defendant’s unique circumstances  
5 warrant the imposition of a shorter admission deadline, the *Stiavetti* judgment does not present  
6 any barrier to that relief. Indeed, existing DSH regulations already permit DSH to admit an IST  
7 defendant for treatment out of waitlist order if doing so is justified by the acuity of the IST  
8 defendant’s mental illness, or other factors. Cal. Code Regs., tit. 9, § 4710(a)(2), 4717. That  
9 different courts might impose different admission deadlines based on the facts before them in an  
10 individual OSC proceeding is entirely consistent with constitutional due process and with the  
11 judgment in *Stiavetti*. The Petition thus misrepresents the risk of inconsistent rulings that could  
12 result from the separate adjudication of OSC proceedings by courts across the state.

13           **2. Individualized Facts and Circumstances, Rather than Common**  
14           **Questions of Fact or Law, Predominate.**

15           There is great variability among IST defendants in terms of psychiatric acuity,  
16 availability of diversion or community-based treatment options, the necessity of state hospital  
17 treatment for the individual’s mental illness(es), the quality of jail mental health treatment and  
18 conditions faced by a particular IST defendant while in jail awaiting admission, and many other  
19 factors. (*See, e.g.*, Kupers Report at 5–11 (“The quality and intensity of mental health  
20 programming in jails varies from county to county in California.”).) Any of these considerations  
21 could require speedier treatment than the 28-day outer limit imposed by the Constitution. IST  
22 defendants with severe psychosis, or that are facing particularly harmful conditions in county  
23 jail, may be seeking expedited admission to a state hospital or other treatment facility. (*See*  
24 *Santa Barbara PD Objection* at 5 (“[I]ssues of fact relevant to delays in placement of our  
25 committed clients necessarily differ from those in the *Stiavetti* litigation in material ways, as  
26 every client is different and every jail environment is different.”); *Nov. 18, 2022 Objection to*  
27 *Petition for Coordination on Behalf of Real-Parties-in-Interest Tanjeet Singh and for Any Present*  
28 *and Future Sonoma County Public Defender Clients* (“*Sonoma PD Objection*”), at 4, JCCP No.  
5248 (same).) Moreover, IST defendants in different counties may have different options for

1 community-based treatment programs, which could also impact the analysis of whether sanctions  
2 for DSH’s failure to utilize such options are appropriate. In short, many individualized facts  
3 relating to particular IST defendants are likely to predominate over any common questions of  
4 law or fact that may exist among the proceedings DSH seeks to coordinate.

5 **3. The Complexity Involved in Coordinating Thousands of OSC**  
6 **Proceedings Across the State Will Undermine the Efficient Utilization**  
7 **of Judicial Resources.**

8 The *Stiavetti* Plaintiffs understand that courts in different counties throughout the  
9 State use drastically different mechanisms to seek to enforce DSH’s obligation to timely admit  
10 IST defendants to a DSH facility for competency restoration treatment. Whereas courts in some  
11 counties have consolidated large numbers of IST defendants’ complaints about admission delays  
12 into a combined proceeding to determine whether sanctions against DSH would be appropriate  
13 (*see, e.g.*, RJN Exs. D, F–L), courts in other counties may hear IST defendants’ petitions for  
14 habeas corpus or requests for sanctions individually. Coordinating all these disparate types of  
15 proceedings before a single coordination judge will prove logistically challenging.

16 Furthermore, many judges that hear cases involving requests for sanctions against  
17 DSH may already be familiar—as a result of having dealt with similar sanctions requests from  
18 other IST defendants—with the conditions faced by IST defendants in their local county jails, the  
19 different community-based treatment programs available in that particular locality, the county’s  
20 processes for transporting IST defendants between jail and a state hospital, and many other  
21 county-specific factors. If all of these proceedings are coordinated and heard in Alameda  
22 County, the efficiencies that would be gained by having each case heard by judges familiar with  
23 county-specific IST procedures would be lost.

24 **4. Thousands of IST Defendants Across the State Will Suffer Prejudice,**  
25 **and Witnesses and Counsel Will Be Inconvenienced, if These**  
26 **Proceedings Are Coordinated Before a Single Court.**

27 The Petition glosses over the Section 404.1 factor that considers “the convenience  
28 of parties, witnesses, and counsel.” But coordinating in Alameda County all 77 of the included  
actions—which range from as far north as Shasta County and as far south as Orange County—  
along with any subsequent OSC proceedings that DSH might seek to coordinate in an add-on

1 petition, would not be more convenient to *any* of the relevant parties and witnesses, aside from  
2 DSH. IST defendants, and their counsel and families, have a strong interest in being able to  
3 attend competency-related proceedings, including proceedings to seek sanctions against DSH, so  
4 that the court can observe firsthand the harms that are caused by DSH’s long admissions delays.  
5 In cases that originate far from Alameda County, delays will mount as the IST defendants,  
6 attorneys, and witnesses involved in each proceeding—individuals who live, work, or are  
7 incarcerated in the county where the case is pending—will be forced to attempt to manage and  
8 appear for a case that could now be hundreds of miles away. For such individuals, coordination is  
9 significantly more inconvenient than having their OSC proceedings heard in the county of origin.

10 **5. The Stage of These Proceedings Warrants Against Coordination.**

11 The Petition is fundamentally flawed in that it seeks to have a coordination judge  
12 preside over DSH’s compliance with orders to show cause and orders imposing sanctions on  
13 DSH that have already been issued by superior court judges from across the State. In doing so,  
14 DSH and DDS seek to extend the coordination mechanism far beyond its intended reach, which  
15 would interfere with courts’ inherent “power to ‘compel obedience to its judgments, orders, and  
16 process.’” *Ironridge Glob. IV, Ltd. v. ScripsAmerica, Inc.*, 238 Cal. App. 4th 259, 267 (2015)  
17 (quoting Code Civ. Pro. § 128(a)(4)); *see also Brown v. Brown*, 22 Cal. App. 3d 82, 84 (1971).  
18 Thus, seeking to have these cases coordinated—which DSH concedes would be atypical given  
19 they “are at their ‘end’ stages” (Petition at 23)—is inappropriate.

20 **6. The Remaining Factors Do Not Weigh in Favor of Coordination.**

21 The remaining factors in Section 404.1—“the calendar of the courts” and “the  
22 likelihood of settlement of the actions without further litigation should coordination be  
23 denied”—do not weigh in favor of coordination, given the overwhelming weight of the other five  
24 factors against coordinating these cases in Alameda County. DSH itself admits that “the  
25 likelihood of settlement . . . is less pertinent to the analysis, as these cases are not of a type that  
26 can typically be settled.” (Petition at 25.) And any marginal benefit that might redound to courts  
27 in the cases that would be coordinated in Alameda County would be outweighed by the  
28 additional time *this Court* would need to spend learning about IST-related procedures in dozens

1 of counties across the state (*see* Kupers Report at 5–11 (discussing differences in jail-based  
2 mental health treatment among different counties in California)), and in the logistical challenges  
3 that would be entailed in coordinating the many OSCs relating to sanctions against DSH going  
4 forward.

5 **III. Any Attempt to Coordinate These Proceedings Would Face Procedural Barriers  
6 and Significant Logistical Challenges.**

7 In its order setting a hearing on the Petition, this Court posed a number of  
8 questions to the parties in the proposed included actions to address at the December 7, 2022  
9 hearing. These questions serve to highlight some of the procedural deficiencies with Petitioners’  
10 request for coordination, and several of the administrative challenges that would burden any  
11 attempt to coordinate the disparate proceedings that are the subject of the Petition.

12 **A. IST Proceedings in Some of the Included Cases May Be Fully Resolved.**

13 The Court’s first question asks, “Are the IST proceedings in the proposed  
14 included cases resolved with the exception of the waitlist and sanctions issues?” The *Stiavetti*  
15 Plaintiffs’ counsel do not know the answer to this; counsel for individual IST defendants  
16 doubtless will. However, based on objections filed by public defenders in certain of the included  
17 proceedings, it appears that all IST proceedings in some of those matters may have fully  
18 concluded. (*See* Santa Barbara PD Objection at 3–5.)

19 **B. This Court May Not Coordinate the Included Cases on Only a Few Narrow  
20 Issues and Immediately Remand All Remaining Issues Over a Party’s  
21 Objections.**

22 The Court’s second question asks, “Is it possible to coordinate cases only for  
23 certain purposes? Can the JCCP be limited to the waitlist and sanctions issues?” Both the  
24 statutes and the Rules of Court provide for the coordination of entire “actions,” not of parts of  
25 actions. *See* Code Civ. Proc. §§ 404.1, 404.3, 404.4; Cal. Rules of Court 3.529(a), 3.531, 3.532.  
26 Most specifically, Code of Civil Procedure Section 404.1 provides that coordination is  
27 appropriate only if “one judge hearing all of the actions *for all purposes* . . . will promote the  
28 ends of justice” (emphasis added). In contrast, when the Rules authorize a court to sever or  
transfer a part of an action, they do so expressly. *See* Cal. Rules of Court 3.542 (authorizing  
court to “remand a coordinated action or any severable claim or issue in that action”); 3.543

1 (authorizing court to transfer “any coordinated action or severable claim in that action”). The  
2 Rules are thus clear that cases must initially be consolidated for all purposes, and severance is  
3 allowed only as authorized by these Rules.

4           As DSH recognizes, many issues in the included actions—including “logistical  
5 concerns related to the commencement of substantive services” such as “transportation of IST  
6 defendants on the waitlist”—are “more appropriately left to the courts in the counties where IST  
7 defendants are detained.” (Petition at 26.) In this circumstance, Civil Procedure Code  
8 Section 404.1 does not even permit the coordination of the included actions in the first place.

9           Moreover, even if these proceedings could be coordinated initially, this Court is  
10 not authorized to immediately remand certain issues in any included action back to the county of  
11 origin if any party to the proceeding objects to such remand. Rule 3.542 provides that “[n]o  
12 action or severable claim or issue in that action may be remanded over the objection of any party  
13 unless the evidence demonstrates a *material change in the circumstances that are relevant to the*  
14 *criteria for coordination* under Code of Civil Procedure section 404.1” (emphasis added). If the  
15 Court were to immediately remand all issues in the included actions other than the “waitlist” and  
16 “sanctions” issues back to the origin counties, there would not have been any “material change in  
17 . . . circumstances” that would warrant such remand under Rule 3.542. Even if no party objects,  
18 the court may remand only “on the stipulation of all parties or on the basis of evidence received  
19 at a hearing.” *Id.* The Rules thus do not authorize the Court simply to coordinate cases for  
20 limited purposes, either initially or by way of remand, at least absent a stipulation by all parties.

21           **C.       Given the Massive Number of IST Defendants Awaiting Admission to DSH**  
22           **Facilities, It Would Be Infeasible to Coordinate Through Liaison Counsel.**

23           The Court’s third question asks “[w]hether any coordination proceeding is  
24 appropriate given that managing the individual cases would appear to require coordination with  
25 District Attorneys, Public Defenders, private counsel, and other persons in each county,” and  
26 whether it is “possible for there to be liaison counsel for the State and a liaison counsel for the  
27 IST defendants to facilitate the identification and presentation of the legal and factual issues.”  
28 Given the large number of IST defendants on DSH’s statewide waitlist at any given time,

1 managing any hypothetical coordinated proceeding of these included actions through centralized  
2 liaison counsel would be infeasible.

3           As described above, *supra* § II.C.2, the decision whether DSH should be subject  
4 to sanctions for failing to admit any particular IST defendant in a timely manner will depend in  
5 part on factors that are specific to the individual IST defendant, including without limitation the  
6 acuity of the individual’s mental illness(es), whether the individual has been or will be subject to  
7 physical or psychiatric harm while waiting in county jail, the available treatment options in and  
8 out of custody, and any unusual circumstances faced by that individual. The applicable  
9 procedure for resolving this question in any individual case will depend on the type of sanctions  
10 proceeding initiated by each court. Given these differences in each individual case, and in light  
11 of the sheer number of IST defendants committed to DSH’s care—there were 12,088 referrals to  
12 DSH over the last three years (Petition at 10)—and the fact that DSH will not be able to admit  
13 most or all of these IST defendants within the constitutionally-required 28-day period, a single  
14 liaison counsel will not be able to effectively advocate for each IST defendant whose rights DSH  
15 is violating.

16           Moreover, each IST defendant’s public defender or private counsel will be far  
17 better equipped to represent his or her client’s interests than a single liaison counsel, who may be  
18 hundreds of miles away from where the IST defendant is incarcerated and who will likely never  
19 see or speak with that IST defendant. Thus, individual IST defendants’ counsel would still need  
20 to be involved in any matters before a coordination judge, and the need to run issues through a  
21 liaison counsel would only add an additional layer of administrative headache to what would  
22 already be an incredibly complex proceeding. And although DSH now proposes that the Officer  
23 of the State Public Defender serve as liaison counsel (Nov. 21, 2022 DSH’s Response to Order  
24 Setting Hearing on Petition to Coordinate (“DSH Response in Supp. of Petition”), at 4), that  
25 agency does not even represent any party, and there is no indication that it is prepared or  
26 authorized to serve in this role.

27           For these reasons, regardless of whether it may be appropriate for a single liaison  
28 counsel to represent DSH in a hypothetical coordinated proceeding, it would not be possible to

1 coordinate representation for the many thousands of IST defendants whose cases would be  
2 affected by such proceedings.

3 Similarly, the Court’s fourth question asks “[w]hether a single statewide  
4 coordinated proceeding is appropriate or whether it might be better to have separate coordinated  
5 proceedings based on the geography of DSH’s administrative structure, or the locations of  
6 DSH’s four hospitals, or similar factors.” Plaintiffs agree that, for the reasons just discussed,  
7 statewide coordinated proceedings are not appropriate or even feasible.

8 **D. Although Coordination Is Inappropriate, This Court Should Preside Over**  
9 **Any Coordinated Proceedings if the Petition Is Granted.**

10 The Court’s fifth question asks for “[t]he location of any coordinated  
11 proceeding(s).” In the Petition, DSH advocates for siting any coordination proceedings in  
12 Alameda County, given this Court’s role presiding over the *Stiavetti* case and the location’s  
13 convenience for DSH witnesses. (*See* Petition at 24, 26–27.) If the Court is inclined to grant  
14 Petitioners’ request for coordination rather than continue to allow OSC proceedings to be heard  
15 in the counties where IST defendants are detained, the *Stiavetti* Plaintiffs agree that this Court  
16 would be best suited to manage the coordinated proceedings.

17 **E. To the Extent Any Sanctions Motions Have Been Fully Litigated, Those**  
18 **Proceedings Are Ineligible for Coordination.**

19 The Court’s sixth question asks “[w]hether to grant the petition for coordination  
20 for all the identified cases”—*i.e.*, whether “some cases [have] been mooted by events after the  
21 filing of the petition.” DSH reports that *all* of the identified proceedings other than *Stiavetti* “are  
22 now moot” and thus “procedurally defective” for the purposes of coordination. (DSH Response in  
23 Supp. of Petition, at 6, 10; Nov. Schoell Decl. ¶ 4.) It also concedes that any new cases “will  
24 almost certainly” become moot soon after being identified. (*See id.* at 9.) Coordination is  
25 authorized only “[w]hen civil actions . . . are pending in different courts.” Code Civ. Proc. §  
26 404. The Petition for Coordination must identify these cases and show that they are eligible for  
27 coordination. *See* Cal. Rules of Court 3.521(a)(2), (7). Although DSH alludes to new cases it  
28 would like to add (*see* DSH Response in Supp. of Petition, at 10), it has not even identified them,  
much less shown that they are eligible for coordination. And the fact that all the identified cases

1 are moot—and that any others it can identify will also quickly resolve—shows both that these  
2 cases are not complex and also that these cases are simply unsuitable for coordination.

3 **CONCLUSION**

4 For all of the foregoing reasons, the Petition should be denied.

5  
6 Dated: November 22, 2022

7 */s/ Laura K. Oswell*

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*Civil Liberties Union of Southern California*

18 SUPERIOR COURT OF CALIFORNIA

19 COUNTY OF ALAMEDA

20 DEPARTMENT OF STATE HOSPITALS  
21 COMPETENCY SERVICES CASES

JCCP No. 5248

22  
23 STEPHANIE STIAVETTI, *et al.*,

Case No. RG15779731

24 Plaintiffs,

**DECLARATION OF EMILIA GARCIA  
IN SUPPORT OF STIAVETTI  
PLAINTIFFS' OPPOSITION TO  
PETITION FOR COORDINATION**

25 v.

26 STEPHANIE CLENDENIN, AS DIRECTOR  
27 OF THE CALIFORNIA DEPARTMENT OF  
STATE HOSPITALS, *et al.*,

Dept: 21  
Judge: Hon. Evelio Grillo  
Hearing Date: December 7, 2022  
Hearing Time: 10:00 a.m.

28 Defendants.

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I, EMILIA GARCIA, declare as follows:

1. I am an investigator employed by Plaintiff American Civil Liberties Union of Northern California (“ACLUNC”), one of the parties in the above-captioned action. I submit this Declaration in support of the *Stiavetti* Plaintiffs’ Opposition to Defendants’ Petition for Coordination, filed concurrently herewith. I have personal knowledge of the facts set forth in this Declaration and, if called upon, could testify to those facts.


2. On September 27, 2022, I submitted a request for certain public records pursuant to California Government Code § 6253 *et seq.* to the California Department of State Hospital (“DSH”) Public Records Act Coordinator. I sent my request for public records using the “DSH PRA Portal” that DSH maintains for the processing of such public records act requests. One of the public records requests sought certain “Individual case records and/or cumulative data related to individuals who died while in custody and on the IST waitlist.”

3. On November 16, 2022, I received a response to my September 27, 2022 request from DSH’s Records Coordination Unit on behalf of Brent W. Reden, the Deputy Director/Chief Counsel of DSH. The response was sent via the DSH PRA Portal, which I received as an email from “californiadsh@govqa.us” to my ACLUNC email account.

4. In response to my request for public records relating to individuals who died while in custody and on the IST waitlist, described in Paragraph 2 above, Mr. Reden responded, in part, by stating that “From January 2019- September 2022, DSH was notified by counties of 21 individuals to remove from the IST waitlist because of death.”

5. A true and correct copy of the above-described email that I received on November 16, 2022 is attached hereto as Exhibit A.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on November 22, 2022.

  
\_\_\_\_\_  
Emilia Garcia, Declarant

# **EXHIBIT A**

## Emilia Garcia

---

**From:** CALIFORNIADSH Support <californiadsh@govqa.us>  
**Sent:** Wednesday, November 16, 2022 8:51 AM  
**To:** Emilia Garcia  
**Subject:** [Records Center] Public Records Act Request :: R220208-092722

**Categories:** Stiavetti, PRA Correspondence

--- Please respond above this line ---



California  
Department of State Hospitals

---

November 16, 2022

Sent by GovQA

EmiliaGarcia

emgarcia@aclunc.org

RE:Public Records Act Request Number R220208

Dear Emilia Garcia:

On September 27, 2022, the Department of State Hospitals received your PublicRecords Act (PRA) Request for:

1. *All recordkeeping templates or tools which capture, compile or analyze incidents of harm to individuals on the IST waitlist, including self-harm, violence inflicted by others, and segregation or isolation.*

**RESPONSE:** The Department has determined that it does not possess any records that are responsive to your request. These are not data fields that the Department tracks.

2. *Any memoranda, manuals, training materials, written policies, communications, and/or reports related to information about custodial deaths of individuals on the IST waitlist.*

**RESPONSE:** The Department has determined that it does not possess any records that are responsive to your request.

3. *Data related to deaths in custody of individuals on IST waitlist: Individual case records and/or cumulative data related to individuals who died while in custody and on the IST waitlist, including:*
  - a. *The number of individuals who died while on the IST waitlist;*
  - b. *Date of arrest;*
  - c. *Date of commitment;*
  - d. *Date of death;*
  - e. *Cause of death—including whether the cause was self-inflicted, violent, and/or due to natural causes;*
  - f. *Time spent on the IST waitlist prior to death; and*
  - g. *County of referral.*

**RESPONSE:** From January 2019- September 2022, DSH was notified by counties of 21 individuals to remove from the IST waitlist because of death. Please note that not all counties may notify the Department as to the reason that an individual needs to be removed from the IST waitlist. To the extent the Department may have individual records that may contain responsive information, the Department is prohibited by law from releasing individual patient information you requested pursuant to laws that include the following: Federal Health Insurance Portability and Accountability Act (HIPAA), specifically Title 45, Code of Federal Regulations section 164.500 et seq. (2013); Government Code section 6254, subdivisions (c) and (k); California Constitution, article I, section 1; Evidence Code sections 992 and 1040; Civil Code section 56 et seq.; Health & Safety Code section 128675 et seq.; and Welfare and Institutions Code section 5328.

4. *Data related to acts of self-harm by individuals on IST waitlist: Individual case records and/or cumulative data related to individuals who engaged in acts of self-harm while on the IST waitlist, including:*
  - a. *The number of individuals who engaged in self-harm while on the IST waitlist;*
  - b. *Date of arrest;*
  - c. *Date of commitment;*
  - d. *Date of act of self-harm;*
  - e. *Whether individual was hospitalized;*
  - f. *Time spent on the IST waitlist prior to act of self-harm;*
  - g. *Date transferred to DSH custody; and*
  - h. *County of referral.*

**RESPONSE:** The Department does not track acts of self-harm for those on the IST waitlist. To the extent the Department may have individual records that may contain responsive information, the Department is prohibited by law from releasing individual patient information you requested pursuant to laws that include the following: Federal Health Insurance Portability and Accountability Act (HIPAA), specifically Title 45, Code of Federal Regulations section 164.500 *et seq.* (2013); Government Code section 6254, subdivisions (c) and (k); California Constitution, article I, section 1; Evidence Code sections 992 and 1040; Civil Code section 56 *et seq.*; Health & Safety Code section 128675 *et seq.*; and Welfare and Institutions Code section 5328.

5. *Data related to acts of violence inflicted on individuals on IST waitlist: Individual case records and/or data related to individuals on the IST waitlist who have suffered injury inflicted by custodial staff or other jailed or incarcerated individuals, including:*
  - a. *The number of individuals who suffered physical injury as a result of violence while on the IST waitlist;*
  - b. *Date of arrest;*
  - c. *Date of commitment;*
  - d. *Date of physical injury;*
  - e. *Type of physical injury;*
  - f. *Cause of physical injury—including whether the cause was inflicted by custodial staff, jailed or incarcerated individuals, or others;*
  - g. *Whether individual was hospitalized;*
  - h. *Time spent on the IST waitlist prior to act of injury;*

i. *Date transferred to DSH custody; and*

j. *County of referral.*

**RESPONSE:** The Department does not track the number of injuries inflicted by custodial staff or other jailed or incarcerated individuals to those on the IST waitlist. To the extent the Department may have individual records that may contain responsive information, the Department is prohibited by law from releasing individual patient information you requested pursuant to laws that include the following: Federal Health Insurance Portability and Accountability Act (HIPAA), specifically Title 45, Code of Federal Regulations section 164.500 *et seq.* (2013); Government Code section 6254, subdivisions (c) and (k); California Constitution, article I, section 1; Evidence Code sections 992 and 1040; Civil Code section 56 *et seq.*; Health & Safety Code section 128675 *et seq.*; and Welfare and Institutions Code section 5328.

6. *Data related to isolation of individuals on IST waitlist: Individual case records and/or cumulative data related to individuals who have been placed in segregation or held in conditions of solitary confinement while on the IST waitlist, including:*

a. *The number of individuals who were placed in segregation or held in conditions of solitary confinement while on the IST waitlist;*

b. *Date of arrest;*

c. *Date of commitment;*

d. *Date of segregation or solitary confinement;*

e. *Type of segregation or solitary confinement;*

f. *Reason for segregation or solitary confinement;*

g. *Length of time of segregation or solitary confinement;*

h. *Time spent on the IST waitlist prior to segregation or solitary confinement;*

i. *Date transferred to DSH custody; and*

j. *County of referral.*

**RESPONSE:** The Department does not track the number of individuals who have been placed in segregation or held in conditions of solitary confinement while on the IST waitlist. To the extent the Department may have individual records that may contain responsive information, the Department is prohibited by law from releasing individual patient information you requested pursuant to laws that include the following: Federal Health Insurance Portability and Accountability Act (HIPAA), specifically Title 45, Code of Federal Regulations section 164.500 *et seq.* (2013); Government Code section 6254, subdivisions (c) and (k); California Constitution, article I, section 1; Evidence Code sections 992 and 1040; Civil Code section 56 *et seq.*; Health & Safety Code section 128675 *et seq.*; and Welfare and Institutions Code section 5328.

7. *Data related to new offenses for in-custody individuals on IST waitlist: Individual case records and/or cumulative data related to individuals who have been charged with a new criminal offense stemming from incident(s) which occurred while the individual was in custody on the IST waitlist, including:*

*a. The number of individuals charged with a criminal case while on the IST waitlist;*

*b. Date of arrest;*

*c. Date of commitment;*

*d. Date of new offense;*

*e. Time spent on the IST waitlist prior to incident;*

*f. Date transferred to DSH custody; and*

*g. County of referral.*

**RESPONSE:** The Department does not track new offenses for in-custody individuals while on the IST waitlist. To the extent the Department may have individual records that may contain responsive information, the Department is prohibited by law from releasing individual patient information you requested pursuant to laws that include the following: Federal Health Insurance Portability and Accountability Act (HIPAA), specifically Title 45, Code of Federal Regulations section 164.500 *et seq.* (2013); Government Code section 6254, subdivisions (c) and (k); California Constitution, article I, section 1; Evidence Code sections 992 and 1040; Civil Code section 56 *et seq.*; Health & Safety Code section 128675 *et seq.*; and Welfare and Institutions Code section 5328.

Sincerely,

Records Coordination Unit

For BRENT W. REDEN

Deputy Director/Chief Counsel (A)

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To monitor the progress or update this request please log into the [Public Records Center](#)





1 **PROOF OF SERVICE**

2 **JCCP Case Name:** DEPARTMENT OF STATE HOSPITALS COMPETENCY SERVICES CASES  
3 **JCCP Case No.:** 5248

4  
5 I am employed in the County of Los Angeles, State of California. I am over the age of 18  
6 and not a party to the within action. My business address is Sullivan & Cromwell LLP, 1888 Century  
7 Park East, Los Angeles, CA 90067-1725.

8 On November 22, 2022, I served the following documents:

- 9 **NOTICE OF *STIAVETTI* PLAINTIFFS' OPPOSITION TO PETITION FOR COORDINATION**  
10 ***STIAVETTI* PLAINTIFFS' MEMORANDUM OF POINTS AND AUTHORITIES IN**  
11 **OPPOSITION TO PETITION FOR COORDINATION**  
12 **DECLARATION OF EMILIA GARCIA IN SUPPORT OF *STIAVETTI* PLAINTIFFS'**  
13 **OPPOSITION TO PETITION FOR COORDINATION**

14 on the interested parties in the subject actions by serving a true copy thereof as indicated below:

15 **SEE ATTACHED SERVICE LIST**

16  **BY U.S. MAIL:** I caused each such envelope with postage thereon fully prepaid  
17 to be deposited in the mail at Los Angeles, California. I am familiar with this firm's practice of  
18 collecting and processing correspondence for mailing, which practice is that when correspondence is  
19 deposited with the personnel responsible for delivering correspondence to the United States Postal  
20 Service, such correspondence is delivered to the United States Postal Service that same day in the  
21 ordinary course of business.

22  **BY ELECTRONIC TRANSMISSION:** I caused the document to be sent to the  
23 e-mail addresses listed in the attached service list. I did not receive, within a reasonable amount of time  
24 after the transmission, any electronic message or other indication that the transmission was unsuccessful.

25 I declare under penalty of perjury under the laws of the State of California that the  
26 foregoing is true and correct.

27 Executed on November 22, 2022 at Los Angeles, California.

28 

Scott Henry

**SERVICE LIST**

<b>Included Case Name and Case Nos.</b>	<b>Mailing and E-mail Addresses</b>
<b>STEPHANIE STIAVETTI, et al. v. STEPHANIE CLENDENIN, AS DIRECTOR OF THE CALIFORNIA DEPARTMENT OF STATE HOSPITALS, et al.</b> RG15779731	Colin D. Schoell Colin.Schoell@doj.ca.gov
<b>PEOPLE v. KUMONEE BUTLER</b> 21-MH010020-1; 21-MH-005438-1; 21-MH-010046; 21-MH-005472	Kathleen Guneratne Brendon D. Woods Tiffany Danao Alameda Public Defender's Office 1401 Lakeside Drive, Suite 400 Oakland, CA 94612-4219 Kathleen.Guneratne@acgov.org Brendon.Woods@acgov.org tiffany.danao@acgov.org  Daniel Roisman Nancy E. O'Malley, District Attorney Alameda County District Attorney's Office 1225 Fallon Street, Room 900 Oakland, CA 94612 dan.roisman@acgov.org
<b>PEOPLE v. SHAQUIN FERGUSON</b> 20-MH-005617; 19-MH009119-1; 21-MH-005839-1	Kathleen Guneratne Brendon D. Woods Tiffany Danao Alameda Public Defender's Office 1401 Lakeside Drive, Suite 400 Oakland, CA 94612-4219 Kathleen.Guneratne@acgov.org Brendon.Woods@acgov.org tiffany.danao@acgov.org  Warren Ko Nancy E. O'Malley, District Attorney Alameda County District Attorney's Office 1225 Fallon Street, Room 900 Oakland, CA 94612 warren.ko@acgov.org

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<b>Included Case Name and Case Nos.</b>	<b>Mailing and E-mail Addresses</b>
<b>PEOPLE v. DARIO FRANCO</b> 22-MH-003675-1; 22-MH-001935-1; 22-MH-000832-1; 21-MH-014648-1; 21-MH-0069601	Kathleen Guneratne Brendon D. Woods Tiffany Danao Alameda Public Defender's Office 1401 Lakeside Drive, Suite 400 Oakland, CA 94612-4219 Kathleen.Guneratne@acgov.org Brendon.Woods@acgov.org tiffany.danao@acgov.org  Nancy E. O'Malley, District Attorney Alameda County District Attorney's Office 1225 Fallon Street, Room 900 Oakland, CA 94612
<b>PEOPLE v. JESUS HEREDIA ESTRADA</b> 21-MH-005194-1	Kathleen Guneratne Brendon D. Woods Tiffany Danao Alameda Public Defender's Office 1401 Lakeside Drive, Suite 400 Oakland, CA 94612-4219 Kathleen.Guneratne@acgov.org Brendon.Woods@acgov.org tiffany.danao@acgov.org  Warren Ko Nancy E. O'Malley, District Attorney Alameda County District Attorney's Office 1225 Fallon Street, Room 900 Oakland, CA 94612 warren.ko@acgov.org

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<b>Included Case Name and Case Nos.</b>	<b>Mailing and E-mail Addresses</b>
<b>PEOPLE v. MARIA OREBEL MENDEZ</b> 21-MH-009758-1	Kathleen Guneratne Brendon D. Woods Tiffany Danao Alameda Public Defender's Office 1401 Lakeside Drive, Suite 400 Oakland, CA 94612-4219 Kathleen.Guneratne@acgov.org Brendon.Woods@acgov.org tiffany.danao@acgov.org  Danielle London Nancy E. O'Malley, District Attorney Alameda County District Attorney's Office 1225 Fallon Street, Room 900 Oakland, CA 94612 danielle.london@acgov.org  John W. Noonan, Esq. 6379 Clark Avenue, Suite 220 Dublin, CA 94568 noonanlaw33@yahoo.com
<b>PEOPLE v. LEONEL MIRANDA</b> 21-MH-014828-1	Kathleen Guneratne Brendon D. Woods Tiffany Danao Alameda Public Defender's Office 1401 Lakeside Drive, Suite 400 Oakland, CA 94612-4219 Kathleen.Guneratne@acgov.org Brendon.Woods@acgov.org tiffany.danao@acgov.org  Ashley Carvolth Nancy E. O'Malley, District Attorney Alameda County District Attorney's Office 1225 Fallon Street, Room 900 Oakland, CA 94612 ashley.carvolth@acgov.org

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<b>Included Case Name and Case Nos.</b>	<b>Mailing and E-mail Addresses</b>
<b>PEOPLE v. MICHAEL TECKLE</b> 21MH005420	Kathleen Guneratne Brendon D. Woods Tiffany Danao Alameda Public Defender's Office 1401 Lakeside Drive, Suite 400 Oakland, CA 94612-4219 Kathleen.Guneratne@acgov.org Brendon.Woods@acgov.org tiffany.danao@acgov.org  Warren Ko Nancy E. O'Malley, District Attorney Alameda County District Attorney's Office 1225 Fallon Street, Room 900 Oakland, CA 94612 warren.ko@acgov.org
<b>PEOPLE v. CHARLES ANDERS</b> 21CF04542-1	E. Ryan Lamb 1550 Humboldt Road, Suite 4 Chico, CA 95928 erlamblaw@gmail.com  Ashley Furry Michael L. Ramsey, District Attorney Butte County District Attorney's Office 25 County Center Drive, Suite 245 Oroville, CA 95965
<b>PEOPLE v. JOEL BIGGINTON</b> 19CF02615-4	E. Ryan Lamb 1550 Humboldt Road, Suite 4 Chico, CA 95928 erlamblaw@gmail.com  Jennifer Dupree-Tokas Michael L. Ramsey, District Attorney Butte County District Attorney's Office 25 County Center Drive, Suite 245 Oroville, CA 95965
<b>PEOPLE v. HALEY BOWEN</b> 21CF05246-1	E. Ryan Lamb 1550 Humboldt Road, Suite 4 Chico, CA 95928 erlamblaw@gmail.com  Jennifer Dupree-Tokas Michael L. Ramsey, District Attorney Butte County District Attorney's Office 25 County Center Drive, Suite 245 Oroville, CA 95965

Included Case Name and Case Nos.	Mailing and E-mail Addresses
<p>1</p> <p>2</p> <p>3 <b>PEOPLE v. VICTORIA FLOYD</b></p> <p>4 21CF05620-1</p> <p>5</p> <p>6</p> <p>7</p>	<p>Grady M. Davis 116 W 2nd Street, Suite 7 Chico, CA 95927 gradydavislaw@sbcglobal.net</p> <p>Michael Tufaro Michael L. Ramsey, District Attorney Butte County District Attorney's Office 25 County Center Drive, Suite 245 Oroville, CA 95965</p>
<p>8 <b>PEOPLE v. JEFFERY HAGAR</b></p> <p>9 20CF03938-1</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p>	<p>Christopher Carlos 506 2nd Street Yuba City, CA 95991 carlos0534@sbcglobal.net</p> <p>David Garner Michael L. Ramsey, District Attorney Butte County District Attorney's Office 25 County Center Drive, Suite 245 Oroville, CA 95965 dgarner@buttecounty.net</p>
<p>14 <b>PEOPLE v. KAO LAO</b></p> <p>15 21CF06521-1</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p>	<p>Saul Henson 330 Wall Street, Suite 10 Chico, CA 95928 saulhensonlaw@gmail.com</p> <p>Megan Grow Michael L. Ramsey, District Attorney Butte County District Attorney's Office 25 County Center Drive, Suite 245 Oroville, CA 95965 mgrow@buttecounty.net</p>
<p>20 <b>PEOPLE v. RHONDA LAURIE</b></p> <p>21 <b>MAGNUSSON</b></p> <p>22 21CF03671-1</p> <p>23</p> <p>24</p> <p>25</p> <p>26</p> <p>27</p> <p>28</p>	<p>Jeff Raven Law Office of Jeff Raven 433 2nd St Ste 100 Woodland, CA 95695-4065 jravenlaw@sbcglobal.net</p> <p>Jacqueline Hunter Michael L. Ramsey, District Attorney Butte County District Attorney's Office 25 County Center Drive, Suite 245 Oroville, CA 95965</p> <p>Stephana Femino 341 Flume Street Chico, CA 95928 sfemino@femino-law.com</p>

Included Case Name and Case Nos.	Mailing and E-mail Addresses
<b>PEOPLE v. KEITH RYAN MILNER</b> 21CF06346-1	E. Ryan Lamb 1550 Humboldt Road, Suite 4 Chico, CA 95928 erlamblaw@gmail.com ndiamondlaw@gmail.com  David Garner Michael L. Ramsey, District Attorney Butte County District Attorney's Office 25 County Center Drive, Suite 245 Oroville, CA 95965 dgarner@buttecounty.net
<b>PEOPLE v. CAMERON ALEXANDER NAVARRO</b> 18CF05593-1	Jeff Raven Law Office of Jeff Raven 433 2nd St Ste 100 Woodland, CA 95695-4065 jravenlaw@sbcglobal.net  Jacqueline Hunter Michael L. Ramsey, District Attorney Butte County District Attorney's Office 25 County Center Drive, Suite 245 Oroville, CA 95965  Stephana Femino 341 Flume Street Chico, CA 95928 sfemino@femino-law.com
<b>PEOPLE v. JOHN A. ROOD</b> 21CF04975-1	Eric Ray Ortner 2053 Forest Avenue, Suite 7 Chico, CA 95928 info@ortnerlawoffice.com  Jennifer Dupree-Tokas Michael L. Ramsey, District Attorney Butte County District Attorney's Office 25 County Center Drive, Suite 245 Oroville, CA 95965
<b>PEOPLE v. PAUL STEVE SEGURA</b> 21CF04579-1	Eric Ray Ortner 2053 Forest Avenue, Suite 7 Chico, CA 95928 info@ortnerlawoffice.com  Michael L. Ramsey, District Attorney Butte County District Attorney's Office 25 County Center Drive, Suite 245 Oroville, CA 95965

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Included Case Name and Case Nos.	Mailing and E-mail Addresses
<p><b>PEOPLE v. JAVIER AGUILAR</b> 21CF2712; 21CF2878; 21CM12060</p>	<p>Adam Vining Allison Chan Brian Waite, Assistant Public Defender Orange County Public Defender Mental Health Court 200 W. Santa Ana Blvd. Suite 970 Santa Ana, CA 92701 Adam.Vining@ocpubdef.com allison.chan@pubdef.ocgov.com</p> <p>Breanna Piper Orange County District Attorney Attn: Law and Motion 300 N. Flower Street Santa Ana, CA 92703 breanna.piper@da.ocgov.com erica.galvan@ocdapa.org</p>
<p><b>PEOPLE v. DONALD EARL BENJAMIN</b> 21CF2511</p>	<p>Adam Vining Allison Chan Brian Waite, Assistant Public Defender Orange County Public Defender Mental Health Court 200 W. Santa Ana Blvd. Suite 970 Santa Ana, CA 92701 Adam.Vining@ocpubdef.com allison.chan@pubdef.ocgov.com</p> <p>Lillie Nicole Chambers Orange County District Attorney Attn: Law and Motion 300 N. Flower Street Santa Ana, CA 92703 erica.galvan@ocdapa.org</p>
<p><b>PEOPLE v. JOSEPH BRAHAM</b> 21CF3526</p>	<p>Adam Vining Shawn McDonald Brian Waite, Assistant Public Defender Orange County Public Defender Mental Health Court 200 W. Santa Ana Blvd. Suite 970 Santa Ana, CA 92701 Adam.Vining@ocpubdef.com Shawn.McDonald@pubdef.ocgov.com</p> <p>Breanna Piper Orange County District Attorney Attn: Law and Motion 300 N. Flower Street Santa Ana, CA 92703 breanna.piper@da.ocgov.com erica.galvan@ocdapa.org</p>

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<b>Included Case Name and Case Nos.</b>	<b>Mailing and E-mail Addresses</b>
<b>PEOPLE v. JASEN CORDIERO</b> M-19685 X A	Adam Vining Kevin R. Stephens Brian Waite, Assistant Public Defender Orange County Public Defender Mental Health Court 200 W. Santa Ana Blvd. Suite 970 Santa Ana, CA 92701 Adam.Vining@ocpubdef.com Kevin.Stephens@pubdef.ocgov.com  Lillie Nicole Chambers Orange County District Attorney Attn: Law and Motion 300 N. Flower Street Santa Ana, CA 92703 erica.galvan@ocdapa.org
<b>PEOPLE v. JOSHUA EASTMAN</b> 21CF3420	Adam Vining Kevin R. Stephens Brian Waite, Assistant Public Defender Orange County Public Defender Mental Health Court 200 W. Santa Ana Blvd. Suite 970 Santa Ana, CA 92701 Adam.Vining@ocpubdef.com Kevin.Stephens@pubdef.ocgov.com  Orange County District Attorney Attn: Law and Motion 300 N. Flower Street Santa Ana, CA 92703 erica.galvan@ocdapa.org
<b>PEOPLE v. AMINADAB GAXIOLOA GONZALEZ</b> M-19498 X A	Adam Vining Kira Rubin Brian Waite, Assistant Public Defender Orange County Public Defender Mental Health Court 200 W. Santa Ana Blvd. Suite 970 Santa Ana, CA 92701 Adam.Vining@ocpubdef.com Kira.Rubin@pubdef.ocgov.com  Mena Guirguis Orange County District Attorney Attn: Law and Motion 300 N. Flower Street Santa Ana, CA 92703 mena.guirguis@da.ocgov.com erica.galvan@ocdapa.org

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<b>Included Case Name and Case Nos.</b>	<b>Mailing and E-mail Addresses</b>
<b>PEOPLE v. DERRION GIBSON</b> 21WF2638	Adam Vining Shawn McDonald Brian Waite, Assistant Public Defender Orange County Public Defender Mental Health Court 200 W. Santa Ana Blvd. Suite 970 Santa Ana, CA 92701 Adam.Vining@ocpubdef.com Shawn.McDonald@pubdef.ocgov.com  Patrick Spires Orange County District Attorney Attn: Law and Motion 300 N. Flower Street Santa Ana, CA 92703 patrick.spires@da.ocgov.com erica.galvan@ocdapa.org
<b>PEOPLE v. WILLIAM GUNDISALVUS</b> 22WF0353; 22WF0304	Adam Vining Shawn McDonald Brian Waite, Assistant Public Defender Orange County Public Defender Mental Health Court 200 W. Santa Ana Blvd. Suite 970 Santa Ana, CA 92701 Adam.Vining@ocpubdef.com Shawn.McDonald@pubdef.ocgov.com  William Ha Orange County District Attorney Attn: Law and Motion 300 N. Flower Street Santa Ana, CA 92703 william.ha@da.ocgov.com erica.galvan@ocdapa.org

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<b>Included Case Name and Case Nos.</b>	<b>Mailing and E-mail Addresses</b>
<b>PEOPLE v. NORMA GORDIAN JIMENEZ 21CF2525</b>	Adam Vining Allison Chan Brian Waite, Assistant Public Defender Orange County Public Defender Mental Health Court 200 W. Santa Ana Blvd. Suite 970 Santa Ana, CA 92701 Adam.Vining@ocpubdef.com allison.chan@pubdef.ocgov.com  Breanna Piper Orange County District Attorney Attn: Law and Motion 300 N. Flower Street Santa Ana, CA 92703 breanna.piper@da.ocgov.com erica.galvan@ocdapa.org
<b>PEOPLE v. STEPHEN ALEXANDER McGAVOCK 21HF1730</b>	Adam Vining Elizabeth Khan Brian Waite, Assistant Public Defender Orange County Public Defender Mental Health Court 200 W. Santa Ana Blvd. Suite 970 Santa Ana, CA 92701 Adam.Vining@ocpubdef.com Elizabeth.Khan@pubdef.ocgov.com  Breanna Piper Orange County District Attorney Attn: Law and Motion 300 N. Flower Street Santa Ana, CA 92703 breanna.piper@da.ocgov.com erica.galvan@ocdapa.org

Included Case Name and Case Nos.	Mailing and E-mail Addresses
<p>1 2 3 4 5 6 7 8 9 10 11</p> <p><b>PEOPLE v. GEORGE THOMAS NASSIF M-19585 X A</b></p>	<p>Adam Vining David F. Poblete Brian Waite, Assistant Public Defender Orange County Public Defender Mental Health Court 200 W. Santa Ana Blvd. Suite 970 Santa Ana, CA 92701 Adam.Vining@ocpubdef.com David.Poblete@pubdef.ocgov.com</p> <p>Claudia Alvarez Orange County District Attorney Attn: Law and Motion 300 N. Flower Santa Ana, CA 92703 claudia.alvarez@da.ocgov.com erica.galvan@ocdapa.org</p>
<p>12 13 14 15 16 17 18 19</p> <p><b>PEOPLE v. ALFRED CHRIS NUNEZ 21WF2129</b></p>	<p>Adam Vining Abby Taylor Brian Waite, Assistant Public Defender Orange County Public Defender Mental Health Court 200 W. Santa Ana Blvd. Suite 970 Santa Ana, CA 92701 Adam.Vining@ocpubdef.com Abby.Taylor@pubdef.ocgov.com</p> <p>Orange County District Attorney Attn: Law and Motion 300 N. Flower Street Santa Ana, CA 92703 erica.galvan@ocdapa.org</p>
<p>20 21 22 23 24 25 26 27 28</p> <p><b>PEOPLE v. JOSE SALAS M-19773</b></p>	<p>Adam Vining Jamie Kim Brian Waite, Assistant Public Defender Orange County Public Defender Mental Health Court 200 W. Santa Ana Blvd. Suite 970 Santa Ana, CA 92701 Adam.Vining@ocpubdef.com Jamie.Kim@pubdef.ocgov.com</p> <p>Breanna Piper Orange County District Attorney Attn: Law and Motion 300 N. Flower Santa Ana, CA 92703 breanna.piper@da.ocgov.com erica.galvan@ocdapa.org</p>

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<b>Included Case Name and Case Nos.</b>	<b>Mailing and E-mail Addresses</b>
<b>PEOPLE v. ANDREW JINHYUN YOON</b> M-19495; 21CF1652	Adam Vining Jamie Kim Brian Waite, Assistant Public Defender Orange County Public Defender Mental Health Court 200 W. Santa Ana Blvd. Suite 970 Santa Ana, CA 92701 Adam.Vining@ocpubdef.com Jamie.Kim@pubdef.ocgov.com  Breanna Piper Orange County District Attorney Attn: Law and Motion 300 N. Flower Santa Ana, CA 92703 breanna.piper@da.ocgov.com erica.galvan@ocdapa.org
<b>PEOPLE v. JESUS AGUILAR</b> 21CR02344; 22CR00014; 22CR00508; 22CR01064	Jess McHarrie Susan Sindelar Giulia Moore Santa Barbara County Public Defender 1100 Anacapa Street Santa Barbara, CA 93101 JMcHarrie@CountyofSB.org ssindelar@publicdefendersb.org gmoore@publicdefendersb.org PDSBMail@publicdefendersb.org  Layla Arshi Joyce E. Dudley, District Attorney Santa Barbara County District Attorney 1112 Santa Barbara Street Santa Barbara, CA. 93101 larshi@co.santa-barbara.ca.us

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<b>Included Case Name and Case Nos.</b>	<b>Mailing and E-mail Addresses</b>
<b>PEOPLE v. ELIAS BANALES</b> 21CR06204; 21CR07723	Jess McHarrie Susan Sindelar Giulia Moore Santa Barbara County Public Defender 1100 Anacapa Street Santa Barbara, CA 93101 JMcHarrie@CountyofSB.org ssindelar@publicdefendersb.org gmoore@publicdefendersb.org PDSBMail@publicdefendersb.org  Layla Arshi Joyce E. Dudley, District Attorney Santa Barbara County District Attorney 1112 Santa Barbara Street Santa Barbara, CA. 93101 larshi@co.santa-barbara.ca.us
<b>PEOPLE v. ALONZO BROWN</b> 20CR06969; 20CR04014; 20CR07507	Jess McHarrie Susan Sindelar Giulia Moore Santa Barbara County Public Defender 1100 Anacapa Street Santa Barbara, CA 93101 JMcHarrie@CountyofSB.org ssindelar@publicdefendersb.org gmoore@publicdefendersb.org PDSBMail@publicdefendersb.org  Layla Arshi Joyce E. Dudley, District Attorney Santa Barbara County District Attorney 1112 Santa Barbara Street Santa Barbara, CA. 93101 larshi@co.santa-barbara.ca.us

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<b>Included Case Name and Case Nos.</b>	<b>Mailing and E-mail Addresses</b>
<b>PEOPLE v. TORREY DUNSON</b> 20CRR01062; 20CR05645; 20CR04301	Jess McHarrie Susan Sindelar Giulia Moore Santa Barbara County Public Defender 1100 Anacapa Street Santa Barbara, CA 93101 JMcHarrie@CountyofSB.org ssindelar@publicdefendersb.org gmoore@publicdefendersb.org PDSBMail@publicdefendersb.org  Layla Arshi Joyce E. Dudley, District Attorney Santa Barbara County District Attorney 1112 Santa Barbara Street Santa Barbara, CA. 93101 larshi@co.santa-barbara.ca.us
<b>PEOPLE v. PATRICIA MICHELLE MCCOY</b> 21CR00711; 20CR01680	Jess McHarrie Susan Sindelar Giulia Moore Santa Barbara County Public Defender 1100 Anacapa Street Santa Barbara, CA 93101 JMcHarrie@CountyofSB.org ssindelar@publicdefendersb.org gmoore@publicdefendersb.org PDSBMail@publicdefendersb.org  Layla Arshi Joyce E. Dudley, District Attorney Santa Barbara County District Attorney 1112 Santa Barbara Street Santa Barbara, CA. 93101 larshi@co.santa-barbara.ca.us



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<b>Included Case Name and Case Nos.</b>	<b>Mailing and E-mail Addresses</b>
<b>PEOPLE v. KEITH DAVID MILTON</b> 21CR06670; 21CR05007; 20CR06290; 19CR09821	Jess McHarrie Susan Sindelar Giulia Moore Santa Barbara County Public Defender 1100 Anacapa Street Santa Barbara, CA 93101 JMcHarrie@CountyofSB.org ssindelar@publicdefendersb.org gmoore@publicdefendersb.org PDSBMail@publicdefendersb.org  Layla Arshi Joyce E. Dudley, District Attorney Santa Barbara County District Attorney 1112 Santa Barbara Street Santa Barbara, CA. 93101 larshi@co.santa-barbara.ca.us
<b>PEOPLE v. JUAN PACHECO</b> 20CR06230; 20CR08068; 21CR05344; 22CR00578; 22CR01424	Jess McHarrie Susan Sindelar Giulia Moore Santa Barbara County Public Defender 1100 Anacapa Street Santa Barbara, CA 93101 JMcHarrie@CountyofSB.org ssindelar@publicdefendersb.org gmoore@publicdefendersb.org PDSBMail@publicdefendersb.org  Layla Arshi Joyce E. Dudley, District Attorney Santa Barbara County District Attorney 1112 Santa Barbara Street Santa Barbara, CA. 93101 larshi@co.santa-barbara.ca.us

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<b>Included Case Name and Case Nos.</b>	<b>Mailing and E-mail Addresses</b>
<b>PEOPLE v. GERRARDO RAMIREZ</b> 20CR02270	Jess McHarrie Susan Sindelar Giulia Moore Santa Barbara County Public Defender 1100 Anacapa Street Santa Barbara, CA 93101 JMcHarrie@CountyofSB.org ssindelar@publicdefendersb.org gmoore@publicdefendersb.org PDSBMail@publicdefendersb.org  Aaron Corey Joyce E. Dudley, District Attorney Santa Barbara County District Attorney 1112 Santa Barbara Street Santa Barbara, CA. 93101 acorey@countyofsb.org
<b>PEOPLE v. REYNALDO SOTO</b> 18CR03245; 19CR04509; 21CR06895; 21CR06903; 21CR06926; 21CR07546	Jess McHarrie Susan Sindelar Giulia Moore Santa Barbara County Public Defender 1100 Anacapa Street Santa Barbara, CA 93101 JMcHarrie@CountyofSB.org ssindelar@publicdefendersb.org gmoore@publicdefendersb.org PDSBMail@publicdefendersb.org  Layla Arshi Joyce E. Dudley, District Attorney Santa Barbara County District Attorney 1112 Santa Barbara Street Santa Barbara, CA. 93101 larshi@co.santa-barbara.ca.us

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<b>Included Case Name and Case Nos.</b>	<b>Mailing and E-mail Addresses</b>
<b>PEOPLE v. STEPHEN WADSWORTH</b> 21CR08284	Jess McHarrie Susan Sindelar Giulia Moore Santa Barbara County Public Defender 1100 Anacapa Street Santa Barbara, CA 93101 JMcHarrie@CountyofSB.org ssindelar@publicdefendersb.org gmoore@publicdefendersb.org PDSBMail@publicdefendersb.org  Layla Arshi Joyce E. Dudley, District Attorney Santa Barbara County District Attorney 1112 Santa Barbara Street Santa Barbara, CA. 93101 larshi@co.santa-barbara.ca.us
<b>PEOPLE v. GABRIEL WISEMAN</b> 21CR07489; 21CR08533	Jess McHarrie Susan Sindelar Giulia Moore Santa Barbara County Public Defender 1100 Anacapa Street Santa Barbara, CA 93101 JMcHarrie@CountyofSB.org ssindelar@publicdefendersb.org gmoore@publicdefendersb.org PDSBMail@publicdefendersb.org  Layla Arshi Joyce E. Dudley, District Attorney Santa Barbara County District Attorney 1112 Santa Barbara Street Santa Barbara, CA. 93101 larshi@co.santa-barbara.ca.us
<b>PEOPLE v. BRANDON BEAGLE</b> 22MH0433	James Baker Amanda Ard Shasta County Public Defender 1815 Yuba Street Redding, CA 96001 aard@co.shasta.ca.us  Craig Omura Shasta County District Attorney 1355 West Street Redding, CA 96001  Shasta County Counsel 1450 Court Street, Suite 332 Redding, CA 96001

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<b>Included Case Name and Case Nos.</b>	<b>Mailing and E-mail Addresses</b>
<b>PEOPLE v. TIFFANY ROCHELLE BEEDY</b> 21F6952; 19F4124; 21M2171; 20M5149; 20M2844	William Bateman Amanda Ard Shasta County Public Defender 1815 Yuba Street Redding, CA 96001 public_defender@co.shasta.ca.us aard@co.shasta.ca.us  Craig Omura Shasta County District Attorney 1355 West Street Redding, CA 96001
<b>PEOPLE v. MARK RAIBLEY</b> 22HM493	William Bateman Amanda Ard Shasta County Public Defender 1815 Yuba Street Redding, CA 96001 public_defender@co.shasta.ca.us aard@co.shasta.ca.us  Curtis Woods Shasta County District Attorney 1355 West Street Redding, CA 96001
<b>PEOPLE v. JOSEPH AMIR RODGERS</b> 19F4574 et seq.	Amanda Ard Shasta County Public Defender 1815 Yuba Street Redding, CA 96001-1723 public_defender@co.shasta.ca.us aard@co.shasta.ca.us  Craig Omura Shasta County District Attorney 1355 West Street Redding, CA 96001  Matthew Izzi 1416 West Street Redding, CA 96001 matthew@izzilawoffice.com

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<b>Included Case Name and Case Nos.</b>	<b>Mailing and E-mail Addresses</b>
<b>PEOPLE v. AUSTIN EVAN SCHUMACHER</b> 22HM495; 21F7252	Shasta County Counsel 1450 Court Street, Suite 332 Redding, CA 96001 public_defender@co.shasta.ca.us  Kristen Gohn Shasta County District Attorney 1355 West Street Redding, CA 96001  Melissa Fanoe Law Office of Melissa France 1416 West Street Redding, CA 96001 melissa@fanoelaw.com
<b>PEOPLE v. MELEIKE STEVENSON</b> 22HM494	William Bateman Amanda Ard Shasta County Public Defender 1815 Yuba Street Redding, CA 96001-1723 public_defender@co.shasta.ca.us aard@co.shasta.ca.us  Nolan Weber Shasta County District Attorney 1355 West Street Redding, CA 96001 nweber@co.shasta.ca.us
<b>PEOPLE v. JANET WILSON</b> 22HB293	William Bateman Amanda Ard Shasta County Public Defender 1815 Yuba Street Redding, CA 96001-1723 public_defender@co.shasta.ca.us aard@co.shasta.ca.us  Craig Omura Shasta County District Attorney 1355 West Street Redding, CA 96001

Included Case Name and Case Nos.	Mailing and E-mail Addresses
<p><b>PEOPLE v. ROBERT CUELLAR</b> FCR357677</p>	<p>Oscar Bobrow Kirby Madden Public Defender's Office 675 Texas Street, Suite 3500 Fairfield, CA 94533 obobrow@solanocounty.com kpmadden@solanocounty.com</p> <p>Hunter Burnette Solano County District Attorney's Office 675 Texas Street, Suite 4500 Fairfield, CA 94533 hjburnette@solanocounty.com</p>
<p><b>PEOPLE v. LONZELL TYRELL McINTOSH</b> FCR362024</p>	<p>Oscar Bobrow Kirby Madden Public Defender's Office 675 Texas Street, Suite 3500 Fairfield, CA 94533 obobrow@solanocounty.com kpmadden@solanocounty.com</p> <p>Matthew Rupp District Attorney's Office 675 Texas Street, Suite 4500 Fairfield, CA 94533</p>
<p><b>PEOPLE v. BRANDIE LOUISE McNARY</b> FCR352963; FCR352498</p>	<p>Oscar Bobrow Lauren Jacobs Public Defender's Office 675 Texas Street, Suite 3500 Fairfield, CA 94533 obobrow@solanocounty.com l_jacobs@solanocounty.com</p> <p>Matthew Rupp District Attorney's Office 675 Texas Street, Suite 4500 Fairfield, CA 94533</p>
<p><b>PEOPLE v. DENNIS MERRIDA</b> VCR235704</p>	<p>John Mendenhall Deputy Public Defender 355 Tuolumne Street, Suite 2200 Vallejo, CA 94590 jmendenhall@solanocounty.com</p> <p>Kirsten Sansoe Solano County District Attorney's Office 675 Texas Street, Suite 4500 Fairfield, CA 94533 klsansoe@solanocounty.com</p>

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Included Case Name and Case Nos.	Mailing and E-mail Addresses
<p>1 2 3 4 5 6 7 8 9</p> <p><b>PEOPLE v. WILLIAM WENZEL NEUBURGER</b> FCR361605</p>	<p>Oscar Bobrow Leslie Buentello Public Defender's Office 675 Texas Street, Suite 3500 Fairfield, CA 94533 obobrow@solanocounty.com lbuentello@solanocounty.com</p> <p>Hunter Burnette Solano County District Attorney's Office 675 Texas Street, Suite 4500 Fairfield, CA 94533 hjburnette@solanocounty.com</p>
<p>10 11 12 13 14 15</p> <p><b>PEOPLE v. JAMAAL D. STORMS</b> FCR358348; FCR347009</p>	<p>Robert Boyle Alternate Public Defenders Office 675 Union Avenue, Suite 3600 Fairfield, CA 94533 rmboyle@solanocounty.com</p> <p>Hunter Burnette Solano County District Attorney's Office 675 Texas Street, Suite 4500 Fairfield, CA 94533 hjburnette@solanocounty.com</p>
<p>16 17 18 19 20 21 22</p> <p><b>PEOPLE v. CHARLES CORNELIUS TYES</b> FCR359852; VCR238166</p>	<p>Oscar Bobrow Jeannette Garcia, Esq. Public Defender's Office 675 Texas Street, Suite 3500 Fairfield, CA 94533 obobrow@solanocounty.com jgarcia@solanocounty.com</p> <p>Eric Charm Solano County District Attorney's Office 675 Texas Street, Suite 4500 Fairfield, CA 94533 Emcharm@solanocounty.com</p>
<p>23 24 25 26 27 28</p> <p><b>PEOPLE v. JOSEPH JULIUS WHITMAN</b> FCR360767</p>	<p>Oscar Bobrow Kirby Madden Public Defender's Office 675 Texas Street, Suite 3500 Fairfield, CA 94533 obobrow@solanocounty.com kpmadden@solanocounty.com</p> <p>Kristyn Wescott Solano County District Attorney's Office 675 Texas Street, Suite 4500 Fairfield, CA 94533</p>

Included Case Name and Case Nos.	Mailing and E-mail Addresses
<p><b>PEOPLE v. NORRIS WILLIAMS</b> FCR361083</p>	<p>Oscar Bobrow Sara Johnson Public Defender's Office 675 Texas Street, Suite 3500 Fairfield, CA 94533 obobrow@solanocounty.com sajohnson@solanocounty.com</p> <p>Ashley Ubois Solano County District Attorney's Office 675 Texas Street, Suite 4500 Fairfield, CA 94533 alubois@solanocounty.com</p>
<p><b>PEOPLE v. TANJEET SINGH CLAIRE</b> SCR-744643-1</p>	<p>Karen Thompson Sonoma County Public Defender's Office 600 Administration Drive, #111-J Santa Rosa, CA 95403 kthomps1@sonoma-county.org Karen.Thompson@sonoma-county.org</p> <p>Barbara Nanney Jill Ravitch, District Attorney Sonoma County District Attorney's Office 600 Administration Drive, Room 212 J Santa Rosa, CA 95403 districtattorney@sonoma-county.org</p>
<p><b>PEOPLE v. JONATAN MACIAS LOPEZ</b> CR-21-011535</p>	<p>Stanislaus County Public Defender's Office 1021 I Street, Suite 201 Modesto, CA 95353-3428</p> <p>Tracy Griffin Birgit Fladager, District Attorney Stanislaus County District Attorney's Office 832 12th Street, Suite 300 Modesto, CA 95354 Tracy.Griffin@standa.org</p>
<p><b>PEOPLE v. STEVE LEE MORRIS</b> CR-21-010999</p>	<p>Matthew Yeoman Stanislaus County Public Defender's Office 1021 I Street, Suite 201 Modesto, CA 95353-3428 yeomanm@stancounty.com</p> <p>Andrew Brown Birgit Fladager, District Attorney Stanislaus County District Attorney's Office 832 12th Street, Suite 300 Modesto, CA 95354</p>

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<b>Included Case Name and Case Nos.</b>	<b>Mailing and E-mail Addresses</b>
<b>PEOPLE v. ANTHONY PINTO</b> CR-22-001780	Stanislaus County Public Defender's Office 1021 I Street, Suite 201 Modesto, CA 95353-3428 pubdefe-service@stancounty.com  Eileen Cavil Birgit Fladager, District Attorney Stanislaus County District Attorney's Office 832 12th Street, Suite 300 Modesto, CA 95354 Eileen.Cavil@standa.org
<b>PEOPLE v. RAYMOND RICO</b> CR-21-012577	Jed Herrington Stanislaus County Public Defender's Office 1021 I Street, Suite 201 Modesto, CA 95353-3428 herringtonj@stancounty.com pubdefe-service@stancounty.com  Birgit Fladager, District Attorney Stanislaus County District Attorney's Office 832 12th Street, Suite 300 Modesto, CA 95354
<b>PEOPLE v. JONATHAN JAMES ROMERO</b> CR-20-003842; CR-20-005074; CR-20- 005100	Aurora Maddocks Stanislaus County Public Defender's Office 1021 I Street, Suite 201 Modesto, CA 95353-3428 pubdefe-service@stancounty.com  Eileen Cavil Birgit Fladager, District Attorney Stanislaus County District Attorney's Office 832 12th Street, Suite 300 Modesto, CA 95354 Eileen.Cavil@standa.org  Samuel Getrich P.O. Box 1050 Salida, CA 95368 samgetrichlaw@gmail.com

Included Case Name and Case Nos.	Mailing and E-mail Addresses
<p><b>PEOPLE v. JEANNIE MARIE SORIANO</b> CR-22-001639</p>	<p>Amy Kennedy Stanislaus County Public Defender's Office 1021 I Street, Suite 201 Modesto, CA 95353-3428 pubdefe-service@stancounty.com</p> <p>Eileen Cavil Birgit Fladager, District Attorney Stanislaus County District Attorney's Office 832 12th Street, Suite 300 Modesto, CA 95354 Eileen.Cavil@standa.org</p>
<p><b>PEOPLE v. TERRY WILLIAMS HUGHES</b> CRF67674; CRM61806; CRM62080; CRM62463; CRM62902; CRM63978; CRM67371</p>	<p>Tuolumne County Public Defender 99 N. Washington St. Sonora, CA 95370</p> <p>Cassandra Jenecke Tuolumne County District Attorney 423 N. Washington Street Sonora, CA 95370 cjenecke@co.tuolumne.ca.us</p>
<p><b>PEOPLE v. EDWARD ISHAM</b> CRF67854; CRF68180; CRM65782; CRM67481; CRM67785; CRM67908; CRM67911; CRM68000; CRM68185; CRM68205; CRM68542</p>	<p>Mark Douglas Smith Tuolumne County Public Defender 99 N. Washington St. Sonora, CA 95370 MSmith@co.tuolumne.ca.us</p> <p>Cassandra Jenecke Tuolumne County District Attorney 423 N. Washington Street Sonora, CA 95370 cjenecke@co.tuolumne.ca.us</p>
<p><b>PEOPLE v. HALEIGH PELLO</b> CRF64077; CRF65163; CRM63560; CRM63946, CRM63992; CRM64039; CRM67336; CRM67348; CRM67634; CRM67740; CRM67852; CRM67894</p>	<p>Scott Gross Tuolumne County Public Defender 99 N. Washington St. Sonora, CA 95370 SGross@co.tuolumne.ca.us</p> <p>Cassandra Jenecke Tuolumne County District Attorney 423 N. Washington Street Sonora, CA 95370 cjenecke@co.tuolumne.ca.us</p>

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<b>Included Case Name and Case Nos.</b>	<b>Mailing and E-mail Addresses</b>
<b>PEOPLE v. AMELIO EREDIO RENERIA</b> CRF66192	Dana Gross Tuolumne County Public Defender 99 N. Washington St. Sonora, CA 95370 DGross@co.tuolumne.ca.us  Cassandra Jenecke Tuolumne County District Attorney 423 N. Washington Street Sonora, CA 95370 cjenecke@co.tuolumne.ca.us
<b>PEOPLE v. MICHELLE VERMON- VONDRA</b> CRF67722	Mark Douglas Smith Tuolumne County Public Defender 99 N. Washington St. Sonora, CA 95370 MSmith@co.tuolumne.ca.us  Cassandra Jenecke Tuolumne County District Attorney 423 N. Washington Street Sonora, CA 95370 cjenecke@co.tuolumne.ca.us
<b>PEOPLE v. NICHOLAS RYAN PRENDIZ</b> 2021003132 M A; 2021002076 M A; 2020027695 M A; 2020027608 M A; 2021011439 F A	Michael Rodriguez William Quest Sandra Bisignani Margaret Manning Claudia Y. Bautista, Public Defender Ventura County Public Defender's Office 800 S. Victoria Avenue – Room #207 Ventura, CA 93009 Michael.Rodriguez@ventura.org William.quest@ventura.org Sandra.Bisignani@ventura.org margaret.manning@ventura.org  Chelsea Noble Erik Nasarenko District Attorney Ventura County District Attorney's Office 800 S. Victoria Avenue, Suite 314 Ventura, CA 93009 chelsea.noble@ventura.org

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<b>Included Case Name and Case Nos.</b>	<b>Mailing and E-mail Addresses</b>
<b>PEOPLE v. JOSE SANCHEZ</b> 2018020003 F A	Michael Rodriguez William Quest Sandra Bisignani Benjamin Maserang, Esq. Claudia Y. Bautista, Public Defender Ventura County Public Defender's Office 800 S. Victoria Avenue – Room #207 Ventura, CA 93009 Michael.Rodriguez@ventura.org William.quest@ventura.org Sandra.Bisignani@ventura.org benjamin.maserang@ventura.org  Roslynn Wilfert Erik Nasarenko District Attorney Ventura County District Attorney's Office 800 S. Victoria Avenue, Suite 314 Ventura, CA 93009 roslynn.wilfert@ventura.org
<b>PEOPLE v. DALLAS SMITH</b> 2021018509	Michael Rodriguez William Quest Sandra Bisignani Michael Albers, Esq. Claudia Y. Bautista, Public Defender Ventura County Public Defender's Office 800 S. Victoria Avenue – Room #207 Ventura, CA 93009 Michael.Rodriguez@ventura.org William.quest@ventura.org Sandra.Bisignani@ventura.org michael.albers@ventura.org  Chelsea Noble Erik Nasarenko District Attorney Ventura County District Attorney's Office 800 S. Victoria Avenue, Suite 314 Ventura, CA 93009 chelsea.noble@ventura.org

Included Case Name and Case Nos.	Mailing and E-mail Addresses
<p>1 2 3 4 5 6 7 8 9 10 11 12</p> <p><b>PEOPLE v. BRYAN WILSON</b> 2021022381 FA</p>	<p>Michael Rodriguez William Quest Sandra Bisignani Melanie Miles Claudia Y. Bautista, Public Defender Ventura County Public Defender's Office 800 S. Victoria Avenue – Room #207 Ventura, CA 93009 Michael.Rodriguez@ventura.org William.quest@ventura.org Sandra.Bisignani@ventura.org melanie.miles@ventura.org</p> <p>Jennifer Feldman Erik Nasarenko District Attorney Ventura County District Attorney's Office 800 S. Victoria Avenue, Suite 314 Ventura, CA 93009 jennifer.feldman@ventura.org</p>
<p>13 14 15 16 17 18 19</p> <p><b>PEOPLE v. AARON RENE HILLS</b> CR21-1735; CR21-1733; CR20-3574; CR20-0485</p>	<p>Joseph Gocke Tracie Olson, County Pubic Defender Yolo County Public Defender's Office 814 North Street Woodland, CA 95695 jgocke@yolocounty.org Joseph.Gocke@yolocounty.org</p> <p>Christopher Bulkeley Yolo District Attorney's Office 301 Second Street Woodland, CA 95695 christopher.bulkeley@yolocounty.org</p>
<p>20 21 22 23 24 25 26 27 28</p> <p><b>PEOPLE v. ROBIN STARR</b> CR21-1812; 21-2722; 19-3231</p>	<p>Joseph Gocke Monica Brushia Tracie Olson, County Pubic Defender Yolo County Public Defender's Office 814 North Street Woodland, CA 95695 jgocke@yolocounty.org Joseph.Gocke@yolocounty.org mbrushia@yolocounty.org</p> <p>Matt De Moura Yolo District Attorney's Office 301 Second Street Woodland, CA 95695 matt.demoura@yolocounty.org</p>