1	ROB BONTA	Exempt from Filing Fees Pursuant to Gov. Code, § 6103
2	Attorney General of California MARK R. BECKINGTON	Fursuant to Gov. Code, § 0103
3	Supervising Deputy Attorney General JOHN D. ECHEVERRIA	FILED
4	Deputy Attorney General State Bar No. 268843	FILED San Francisco County Superior Court
5	455 Golden Gate Avenue, Suite 11000 San Francisco, CA 94102-7004	MAY U7 2021
6	Telephone: (415) 510-3479 Fax: (415) 703-1234	CLERK OF THE COURT BY: Kill have Dil
7	E-mail: John.Echeverria@doj.ca.gov Attorneys for Defendants	Deputy Clerk
8	SUPERIOR COURT OF TH	E STATE OF CALIFORNIA
9	COUNTY OF SA	AN FRANCISCO
10.		
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12	THE OF A MENTENATIVE COAT ANYON	G N. CDD 10 516545
13	FIRST AMENDMENT COALITION; KQED INC.,	Case No. CPF-19-516545
14	Plaintiffs,	(bu)
15	v.	STIPULATION AND [PROPOSED] CORDER RE: WITHHOLDING LOG
16	WANTED DECEDDA A44	Dept: 306
17.	XAVIER BECERRA, Attorney General of the State of California; CALIFORNIA	Judge: Hon. Richard B. Ulmer, Jr. Action Filed: February 14, 2019
18	DEPARTMENT OF JUSTICE,	
19	Defendants.	
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STIPULATION

The parties to the above-captioned action, Plaintiffs First Amendment Coalition and KQED Inc. (together, "Plaintiffs"), on the one hand, and Defendants Rob Bonta, in his official capacity as the Attorney General of the State of California, and the California Department of Justice (together, "Defendants"), on the other hand, hereby stipulate as follows:

WHEREAS, on February 1, 2021, Plaintiffs filed a Motion for Further Production, seeking production of records withheld and information redacted in Defendants' compliance with the writ of mandate issued in this action:

WHEREAS, during the March 26, 2021 hearing on Plaintiffs' motion, the Court instructed the parties to meet and confer about a scheduling for the completion of Defendants' production of written records, excluding audio recordings, photographic files, video files, and transcripts, and production of a log of all records withheld and the reasons for the withholdings;

WHEREAS, on March 26, 2021, the Court issued an order requiring Defendants to create and produce logs of records withheld in their entirety, stating "the record's title, subject matter and date, any sender(s) and/or recipient(s), and the ground(s) for withholding"; and

WHEREAS, on April 15, 2021, the parties met and conferred telephonically and agreed to a proposed schedule for Defendants' completion of the production and preparation of a withholding log;

NOW, THEREFORE, the parties hereby stipulate and agree that the following schedule should be adopted by the Court:

First, Defendants will aim to complete their production of written records, excluding audio recordings, photographic files, video files, and transcripts, by September 26, 2021, unless that date is modified by Court order for good cause.

Second, within 30 days after the completion of the production (i.e., September 26, 2021 or an earlier date), Defendants will produce to Plaintiffs a log of all records withheld from the production, as specified in the Court's March 26, 2021 Order.

¹ On April 23, 2021, Rob Bonta became the Attorney General of the State of California. Attorney General Bonta will need to be substituted as a defendant in place of his predecessor, Xavier Becerra. (See Code Civ. Proc., § 368.5.)₂

1	Third, within 14 days after Defendants' production of the withholding log, the parties will	
2	file a joint status report to apprise the Court on the status of the production and to propose a	
3	schedule for briefing any remaining legal disputes concerning the production.	
4	Respectfully Submitted,	
5	Dated: April, 2021 ROB BONTA	
6	Attorney General of California MARK R. BECKINGTON	
7	Supervising Deputy Attorney General	
8	1/1/1	
9		
10	JOHN D. ECHEVERRIA Deputy Attorney General	
11	Attorneys for Defendants	
12	May 3 Dated: April, 2021 LAW OFFICE OF MICHAEL T. RISHER	
13	Dated; April, 2021 LAW OFFICE OF MICHAEL T. RISHER	
14		
15	Jul Volah	
16	MICHAEL T. RISHER Attorney for Plaintiff First Amendment	
17	Coalition	
18	Dated: May 3, 2021 DAVIS WRIGHT TREMAINE LLP	
19		
20	Sin 2 Sl	
21	THOMAS R. BURKE	
22	Attorney for Plaintiff KQED, Inc.	
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[PROPOSED] ORDER

In light of the parties' stipulation, the Court adopts the following schedule:

Defendants shall complete the production of written records, excluding audio recordings, photographic files, video files, and transcripts, by September 26, 2021, unless that date is modified by Court order for good cause.

Within thirty (30) days after Defendants' completion of the production of such records, Defendants shall produce to Plaintiffs a log of all records withheld from the production, as specified in the Court's March 26, 2021 Order.

Within fourteen (14) days after Defendants' production of the withholding log, the parties shall file a joint status report to apprise the Court on the status of the production and to propose a schedule for briefing any remaining legal disputes concerning the production.

IT IS SO ORDERED.

Dated: $\frac{5/7/21}{}$

The Honorable Richard Ulmer Judge of the Superior Court

First Amendment Coalition, et al. v. Xavier Becerra, et al.

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CERTIFICATE OF SERVICE BY MAIL (C.C.P. §1013)

The undersigned certifies, under penalty of perjury, that: I am employed in the City and County of San Francisco, California, am over the age of 18 years, and am not a party to the within action. I served the attached **Stipulation and Order Re: Withholding Log** by enclosing a true copy thereof in an envelope(s) addressed as shown below and placing the envelope(s) for collection and mailing on **May 7, 2021** in San Francisco, California following the Court's ordinary practices. I am readily familiar with the Court's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

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Dated: May 7, 2021

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Case No: CPF-19-516545

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Bv:

'R! Michael Diles
Deputy Court Clerk

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