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13 UNITED STATES DISTRICT COURT
14 CENTRAL DISTRICT OF CALIFORNIA

15 **KATIE A.** by and through her next
16 friend Michael Ludin; **MARY B.** by and
17 through her next friend Robert Jacobs;
18 **JANET C.** by and through her next
19 friend Dolores Johnson; **HENRY D.** by
20 and through his next friend Gillian
21 Brown; **AND GARY E.** by and through
22 his next friend Michael Ludin;
23 individually and on behalf of others
24 similarly situated,

25 Plaintiffs,

26 v.

27 **TOBY DOUGLAS**, Director of
28 California Department of Health Care
Services; **LOS ANGELES COUNTY;**
LOS ANGELES COUNTY
DEPARTMENT OF CHILDREN
AND FAMILY SERVICES; PHILIP
BROWNING, Director of the Los
Angeles County Department of Children
and Family Services; **WILL**
LIGHTBOURNE, Director of the
California Department of Social
Services, and **DOES 1 through 100,**
Inclusive,

Defendants.

Case No. CV-02-05662 AHM
(Shx)

PLAINTIFFS' CLARIFICATION
TO THE SPECIAL MASTER'S
SUPPLEMENTAL PROGRESS
REPORT ON THE
IMPLEMENTATION OF THE
KATIE A. PLAN

Status Conference

DATE: March 13, 2013
TIME: 3:00 p.m.
PLACE: Courtroom 14

Assigned to:
Judge A. Howard Matz

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1 Plaintiffs wish to clarify the following statement in the Special Master's
2 Supplemental Progress Report on the Implementation of the Katie A. Plan
3 that:

4 "The State is in agreement with the Proposed Modification of
5 Implementation Plan Timelines and, as the Special Master
6 understands, the Plaintiffs won't object to Proposed Modification of
7 Implementation Plan Timelines but remain concerned about possible
8 future delays and its impact on Court Jurisdiction."


9 Docket No. 839, at page 18, line 31, through page 19, line 3.

10 A more accurate description of Plaintiffs' position is that:

11 "Plaintiffs do not object to Proposed Modification of Implementation
12 Plan Timelines subject to their ongoing reservation of rights that the
13 deadline for terminating the Court's jurisdiction over the State
14 Defendants in this lawsuit should be extended beyond the current date
15 of December 1, 2014. "

16
17 DATE: March 4, 2013

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19 By: 
20 ROBERT D. NEWMAN
21 Attorneys for Plaintiffs
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