

1 LLOYD W. PELLMAN, County Counsel
2 JAMES M. OWENS, Acting Assistant County Counsel (82599)
3 CATHERINE J. PRATT, Senior Deputy County Counsel (132118)
4 Children's Services Division
5 201 Centre Plaza Drive, Suite 1
6 Monterey Park, CA 91754-2143
Telephone: (323) 526-6242
Facsimile: (323) 881-3791

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CENTRAL DISTRICT OF CALIFORNIA
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6 Attorneys for Los Angeles County

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

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11 Katie A. et al.,

CASE NO. CV-02-05662
AHM (SHx)

12 Plaintiffs,

STIPULATION BETWEEN
PLAINTIFFS AND COUNTY
DEFENDANTS REGARDING
DEFINITION OF CLASS
MEMBERS; [PROPOSED] ORDER

13 v.

14 Diana Bontá et al.,

15 Defendants.

Room: 14

The Hon. A. Howard Matz,
District Court Judge

19 The Plaintiffs and the County of Los Angeles, through their respective
20 counsel, stipulate and agree that the following definition of the plaintiff class shall
21 be used for the purposes of the settlement agreement approved by this Court on
22 July 16, 2003:

23 The class members include children and young adults who:
24 (a) are in the custody of Los Angeles County Department of Children and
25 Family Services ("DCFS") in foster care or who are at imminent risk of foster care
26 placement by DCFS; and

27 (b) are eligible for services under the Early and Periodic Screening,
28 Diagnosis and Treatment ("EPSDT") program of the Medicaid Act, as defined in

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1 42 U.S.C. § 1396 et seq.; and

2 (c) have a mental illness or condition that is documented or, had an
3 assessment been completed, could have been documented; and

4 (d) need individualized mental health services, including but not limited to
5 professionally acceptable assessments, behavioral support and case management
6 services, family support, crisis support, therapeutic foster care, and other medically
7 necessary services in the home or in a home-like setting, to treat or ameliorate their
8 illness or condition.

9 Insofar as the above definition is functionally the same as that definition
10 contained in the written settlement agreement and in order to clarify any ambiguity
11 that may exist as to the meaning of the definition in the existing written settlement
12 agreement, the above definition shall replace the definition of the class included in
13 the written settlement agreement previously lodged with this Court and comports
14 with the definition agreed to by counsel for Plaintiffs and the County at the fairness
15 hearing conducted on July 16, 2003.

17 IT IS SO STIPULATED AND AGREED.

19 Dated: February 18, 2004

LLOYD W. PELLMAN
County Counsel
JAMES M. OWENS
Acting Assistant County Counsel
CATHERINE J. PRATT
Senior Deputy County Counsel

23 By C. Pratt
CATHERINE J. PRATT

Attorneys for County Defendants

27 IT IS SO ORDERED
Dated 2/23/04
[Signature]
United States District Judge

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Dated: February 13, 2004

ROBERT D. NEWMAN
KIMBERLY LEWIS
Western Center on Law and Poverty

By Kimberly Lewis

SCANNED

Attorneys for the Plaintiffs

IT IS SO ORDERED.

Dated: February 13, 2004

THE HONORABLE A. HOWARD MATZ
UNITED STATES DISTRICT COURT
JUDGE

DECLARATION OF SERVICE

SCANNED

STATE OF CALIFORNIA, County of Los Angeles:

NANCY TSAI states: I am and at all times herein mentioned have been a citizen of the United States and a resident of the County of Los Angeles, over the age of eighteen years and not a party to nor interested in the within action; that my business address is 201 Centre Plaza Drive, Suite 1, City of Monterey Park, County of Los Angeles, State of California; that I am readily familiar with the business practice of the Los Angeles County Counsel for collection and processing of correspondence for mailing with the United States Postal Service; and that the correspondence would be deposited within the United States Postal Service that same day in the ordinary course of business.

That on the 18th day of February, 2004, I served the attached

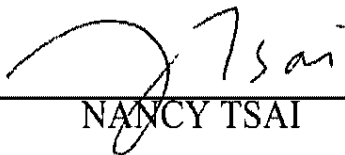
**STIPULATION BETWEEN PLAINTIFFS AND
COUNTY DEFENDANTS REGARDING DEFINITION OF
CLASS MEMBERS; [PROPOSED] ORDER**

upon Interested Party(ies) by depositing copies thereof, enclosed in a sealed envelope and placed for collection and mailing on that date following ordinary business practices in the United States Postal Service, addressed as follows:

See Attached Service List

- (BY MAIL)** I am "readily familiar" with this office's practice of collection and processing correspondence by mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage fully prepaid at Los Angeles, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
- (FEDERAL)** I declare that I am employed in the offices of a member of this court at whose direction the service was made

I declare under penalty of perjury that the foregoing is true and correct. Executed this 18th day of February, 2004, at Monterey Park, California.



NANCY TSAI

Katie A. et al. v. Diana Bontá et al.

CV-02-05662 AHM (SHx)

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SERVICE LIST

Mark D. Rosenbaum, Esq.
Ben Wizner, Esq.
American Civil Liberties Union
of Southern California
1616 Beverly Boulevard
Los Angeles, California 90026-5752
(Attorneys for Plaintiffs)

Melinda Bird, Esq.
Marilyn Holle, Esq.
Protection & Advocacy, Inc.
3580 Wilshire Boulevard
Suite 902
Los Angeles, California 90010
(Attorneys for Plaintiffs)

Robert Garcia, Esq.
Erica Flores, Esq.
Center for Law in the Public Interest
3250 Ocean Park Boulevard
Suite 300
Santa Monica, California 90405
(Attorneys for Plaintiffs)

Robert D. Newman, Esq.
Kimberly Lewis, Esq.
Western Center on Law and Poverty
3701 Wilshire Boulevard
Suite 208
Los Angeles, California 90010-2809
(Attorneys for Plaintiffs)

Ronald C. Peterson, Esq.
Carlyle W. Hall III, Esq.
Heller Ehrman White &
McAuliffe LLP
601 South Figueroa Street, 40th Floor
Los Angeles, California 90017-5758
(Attorneys for Plaintiffs)

Ira Burnim, Esq.
Bazelon Center for Mental Health Law
1101 Fifteenth Street, NW
Suite 1212
Washington, DC 20006
(Attorneys for Plaintiffs)

Patrick Gardner, Esq.
Katina Ancar, Esq.
National Center for Youth Law
405 - 14th Street, 15th Floor
Oakland, California 94612-2701
(Attorney for Plaintiffs)

Sandra L. Goldsmith
Deputy Attorney General
300 South Spring Street, Room 1702
Los Angeles, California 90013

Miriam A. Krinsky, Esq.
Children's Law Center of Los Angeles
201 Centre Plaza Drive, Suite 10
Monterey Park, CA 91754-2178