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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

**JANINE CHANDLER; KRYSTAL
GONZALEZ; TOMIEKIA JOHNSON;
NADIA ROMERO, individuals; and
WOMAN II WOMAN, a California non-
profit corporation,**

Plaintiff,

v.

**CALIFORNIA DEPARTMENT OF
CORRECTIONS AND
REHABILITATION; KATHLEEN
ALLISON, Secretary of the California
Department of Corrections and
Rehabilitation, in her official capacity;
MICHAEL PALLARES, Warden, in his
official capacity; MONA D. HOUSTON,
Warden, in her official capacity; and DOES
1-10, inclusive,**

Defendants.

1:21-cv-01657-JLT-HBK

**DEFENDANTS' MOTION TO FILE
REDACTED EXHIBITS TO THIS SEN
DECLARATION AND IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS**

Judge: The Honorable Jennifer L.
Thurston
Date: May 19, 2022 at 9:00 a.m.
Courtroom: 4, 7th Floor
Trial Date: N/A
Action Filed: November 17, 2021

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**TO PLAINTIFFS CHANDLER, GONZALEZ, JOHNSON, ROMERO, AND
WOMAN II WOMAN:**

Please take notice that Defendants California Department of Corrections and Rehabilitation (CDCR), *et al.*, move under Civil Local Rule 140 to file redacted documents in support of their motion to dismiss. Specifically, Defendants seek to file Exhibits A, B, and F through K with the Declaration of J. Thissen with redactions to certain information.

MOTION TO FILE UNDER SEAL

Under Local Rule 140, Defendants seek to file exhibits with certain information redacted with the Declaration of J. Thissen, submitted in support of Defendants' Motion to Dismiss filed on April 11, 2022. These exhibits to J. Thissen's declaration contain the names of minor individuals, including the minor children of one plaintiff, and the names of other private individuals that are neither a party to this action nor employees of CDCR. Failure to redact these records will violate these individuals' privacy and confidentiality. Defendants require the declaration of J. Thissen and the accompanying records to support their motion to dismiss. Thus, Defendants move that Exhibits A, B, and F through K of J. Thissen's declaration be filed as redacted copies. Redacted copies of Exhibits A, B, and F through K through 7 will be provided to Plaintiff's counsel. If the Court orders it, pursuant to Civil Local Rule 140(b) or (c), Defendants can provide the Court with unredacted copies of these records and requests that this be done under seal and for in camera review.

Defendants have reviewed and complied with this Court's Standing Order governing administrative actions and Defendants have reviewed and complied with Civil Local Rule 140.

1 Dated: April 11, 2022

Respectfully submitted,

2 ROB BONTA
3 Attorney General of California
4 PREETI K. BAJWA
5 Supervising Deputy Attorney General

6 */s/ Anthony Corso*
7 ANTHONY N. CORSO
8 Deputy Attorney General
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10 *CDCR, K. Allison, M. Houston, and M.*
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