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ENDORSED
FILED
San Francisco County Superior Court

FEB 17 1997

BY: ALAN CALDERON, Clerk
CYNTHIA A. SHERIDAN, Deputy Clerk



6 Attorneys for Respondents
7 Eloise Anderson & Calif.
Department of Social Services
8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 FOR THE COUNTY OF SAN FRANCISCO

10
11 KAREN JONES-MASON,) CASE NO. 982959
12)
Petitioner,) STIPULATION TO STAY
13) PROCEEDINGS
v.)
14)
15 ELOISE ANDERSON, Director,)
California Department of Social)
16 Services, and CALIFORNIA)
DEPARTMENT OF SOCIAL SERVICES,)
17)
Defendants.)

18 WHEREAS, petitioner KAREN JONES-MASON ("Jones-Mason")
19 and respondents ELOISE ANDERSON, Director, California Department
20 of Social Services, and CALIFORNIA DEPARTMENT OF SOCIAL SERVICES
21 (hereinafter "Social Services"), by and through their attorneys:
22 a. Share the common goal of ensuring the prompt
23 enactment of well-drafted regulations regarding the licensure
24 standards for group homes pursuant to Assembly Bill 1197 (Chapter
25 1088/Statutes of 1993) which relates to the placement and care of
26 children under six years of age in community care facilities
27 licensed as group homes and in temporary shelter care facilities;
28 b. Seek to achieve this goal without the time and

1 expense of litigation; and,

2 c. Agree to a work plan (attached to this Stipulation
3 as Attachment A) for achieving this goal.

4 **THEREFORE**, Jones-Mason and Social Services hereby
5 stipulate and agree that:

6 1. Social Services commits to make all reasonable
7 efforts to achieve each listed activity by the date set forth in
8 the work plan. The dates in the work plan reflect the fastest
9 schedule reasonably possible given the importance of ensuring
10 quality regulations and are based on the assumptions that Jones-
11 Mason's attorneys will meet their deadline in the work plan for
12 getting comments back to Social Services; that public testimony
13 about the proposed regulations will not require evaluation of
14 whether to make substantive changes to the regulations (i.e., the
15 public testimony will be supportive of the regulations or relate
16 to minor matters such as syntax, spelling, or numbering); that
17 there will not be a need to hold public hearings in addition to
18 what is in the work plan; and that there will be no unforeseen
19 obstacles to achieving the work plan.

20 2. If Social Services is unable to or anticipates not
21 being able to complete an activity by the date set forth in the
22 work plan, then Social Services (through Deputy Attorney General
23 Amy Hertz) shall notify Jones-Mason (through either attorney
24 Carole Shauffer of the Youth Law Center or attorney Alice
25 Bussiere of the National Center for Youth Law) and the parties
26 shall seek to exhaust all reasonable nonlitigation efforts to
27 reach agreement on a revised work plan.

28 3. If the parties are unable to reach agreement on a

1 revised work plan, then Jones-Mason may ask the Court to set a
2 hearing to resolve issues on which the parties cannot agree
3 and/or may give Social Services 5 court days written notice that
4 it must answer the writ.

5 4. Jones-Mason agrees to within 5 court days of the
6 signing of this Stipulation take off calendar the hearing in the
7 above-captioned matter now set for February 27, 1997.

8 5. This stipulation is a product of mutual negotiation
9 and shall not be deemed to have been prepared or drafted by any
10 one party.

11 6. This stipulation is the entire agreement between
12 the parties. No promise, inducement, or agreement not herein
13 expressed has been made.

14 7. This stipulation shall not be modified except in
15 writing.

16 8. This stipulation may be executed in one or more
17 counterparts which taken together shall be considered one and the
18 same document.

19 IT IS SO STIPULATED.

20 SOCIAL SERVICES

21 By: Martha Lopez
22 Martha Lopez
23 Deputy Director, Community Care
24 Licensing Division


Dated: 2-10-97

25 By: Amy J. Hertz
26 AMY J. HERTZ, Deputy Attorney
27 General
28 Attorney for Social Services

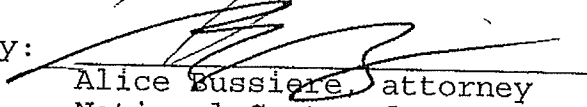
Dated: 2-11-97

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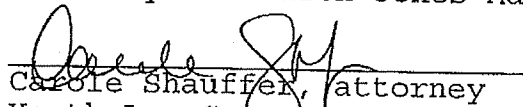
JONES-MASON

By: 
Karen Jones-Mason

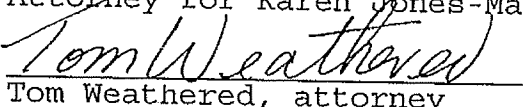
Dated: 2/20/97

By: 
Alice Bussiere, attorney
National Center for Youth Law
Attorney for Karen Jones-Mason

Dated: 2/14/97

By: 
Carole Shauffer, attorney
Youth Law Center
Attorney for Karen Jones-Mason

Dated: 2/14/97

By: 
Tom Weathered, attorney
Attorney for Karen Jones-Mason

Dated: 2/14/97

1 ATTACHMENT A TO SETTLEMENT STIPULATION: WORK PLAN
2
3
4

5 Activity

Date

6 Social Services provides
7 Jones-Mason's attorney,
8 Carole Shauffer, with draft
9 proposed regulations

February 21, 1997

10 Jones-Mason provides
11 Peter Castillo (Department
12 of Social Services,
13 744 P Street, M.S. 4-161,
14 Sacramento, CA 95814-6413)
15 with written comments on
16 the proposed regulations

March 7, 1997

17 Social Services gives
18 Notice of Proposed Action

May 4, 1997

19 Social Services' Office
20 of Regulation Development
21 conducts Public Hearing

June 18, 1997

22 Office of Regulations
23 Development files
24 regulations with
25 Office of Administrative
26 Law with request that
27 the regulations become
28 Effective Immediately
after filing with the
Secretary of State (rather
than the usual 30 days after
filing)

August 25, 1997

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