

# **Exhibit 1**

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6 Attorneys for Defendants  
7

8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

10

11 ASHOK BABU, ROBERT BELL, IBRAHIM  
KEEGAN-HORNSBY, DEMAREA  
12 JOHNSON, BRANDON JONES,  
STEPHANIE NAVARRO, ROBERTO  
13 SERRANO, and ALEXANDER  
WASHINGTON on behalf of themselves and  
14 all others similarly situated,

15 Plaintiffs,

16 v.

17 COUNTY OF ALAMEDA; GREGORY J.  
AHERN in his official capacity as Sheriff of  
18 the Alameda County Sheriff's Office;  
KARYN TRIBBLE in her official capacity as  
19 Director of Alameda County Behavioral  
Health Department,  
20

21 Defendants.

Case No. 5:18-cv-07677-NC

**DECLARATION OF SAMANTHA D.  
WOLFF IN SUPPORT OF DEFENDANTS'  
STATEMENT OF NON-OPPOSITION TO  
PLAINTIFFS' MOTION FOR  
PRELIMINARY APPROVAL OF  
CONSENT DECREE**

Date: September 22, 2021  
Time: 1:00 P.M.

Judge: Honorable Nathanael Cousins

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1 I, Samantha D. Wolff, declare as follows:

2 1. I am an attorney duly admitted to practice before this Court. I am a partner with  
3 Hanson Bridgett LLP, attorneys of record for Defendants County of Alameda, Sheriff Gregory  
4 Ahern, and Karyn Tribble (“Defendants”). I have personal knowledge of the facts set forth herein,  
5 except as to those stated on information and belief and, as to those, I am informed and believe  
6 them to be true. If called as a witness, I could and would competently testify to the matters stated  
7 herein.

8 2. Counsel for Plaintiffs and Defendants have been in communication with attorneys  
9 for the Civil Rights Division of the U.S. Department of Justice (“Department”) following the  
10 Department’s issuance of its April 22, 2021 Notice Regarding Investigation of Alameda County,  
11 John George Psychiatric Hospital, and Santa Rita Jail. Attorneys for the Department have been  
12 involved in good faith meet-and-confer discussions pertaining to the terms of the proposed  
13 Consent Decree with counsel for Plaintiffs and Defendants. The Department has reviewed the  
14 proposed Consent Decree closely and does not object to Plaintiffs’ Motion. Attached as **Exhibit**  
15 **A** is a true and correct copy of a letter from U.S. Department of Justice Acting Special Counsel  
16 Maura Klugman to myself, dated August 18, 2021, in which Ms. Klugman indicates the  
17 Department’s position with respect to the pending motion.

18 I declare under penalty of perjury under the laws of the United States of America that the  
19 foregoing is true and correct.

20 Executed on this 26th day of August, 2021, at Lafayette, California.

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/s/ Samantha Wolff  
Samantha D. Wolff

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# **Exhibit A**



**U.S. Department of Justice**

Civil Rights Division

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*950 Pennsylvania Ave, NW  
Washington DC 20530*

August 18, 2021

Samantha Wolff  
Hanson Bridgett LLP  
425 Market Street, 26th Floor  
San Francisco, CA 94105

Dear Ms. Wolff:

Thank you for providing the United States Department of Justice (DOJ) with the opportunity to review drafts of the consent decree in *Babu et al. v. Ahern, et al.*, Case No. 5:18-cv-7677. This letter confirms that DOJ has no objections to the parties' joint motion for approval of the consent decree.

Sincerely,

/s/ Maura M. Klugman

Maura M. Klugman  
Acting Special Counsel

cc:

Jeffrey L. Bornstein  
Kara Jane Janssen  
101 Mission Street, Sixth Floor  
San Francisco, CA 94105

*Counsel for Plaintiffs*