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14 Attorneys for Plaintiffs

16 UNITED STATES DISTRICT COURT
 17 SOUTHERN DISTRICT OF CALIFORNIA

18 DARRYL DUNSMORE, ERNEST
 ARCHULETA, ANTHONY EDWARDS,
 19 REANNA LEVY, JOSUE LOPEZ,
 CHRISTOPHER NELSON,
 20 CHRISTOPHER NORWOOD, and
 LAURA ZOERNER, on behalf of
 21 themselves and all others similarly situated,

22 Plaintiffs,

23 v.

24 SAN DIEGO COUNTY SHERIFF'S
 DEPARTMENT, COUNTY OF SAN
 DIEGO, CORRECTIONAL
 25 HEALTHCARE PARTNERS, INC.,
 LIBERTY HEALTHCARE, INC., MID-
 26 AMERICA HEALTH, INC., LOGAN
 HAAK, M.D., INC., SAN DIEGO
 27 COUNTY PROBATION DEPARTMENT,
 and DOES 1 to 20, inclusive,

28 Defendants.

Case No. 3:20-cv-00406-AJB-WVG

**DECLARATION OF CEDRICK
 JONES IN SUPPORT OF
 PLAINTIFFS' MOTIONS FOR
 PRELIMINARY INJUNCTION
 AND PROVISIONAL CLASS
 CERTIFICATION**

Judge: Hon. Anthony J. Battaglia

Trial Date: None Set

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DECLARATION OF CEDRICK JONES

I, Cedrick Jones, declare:

1. I have personal knowledge of the matters set forth herein, and if called as a witness, I could and would competently so testify.

2. I have been incarcerated at the San Diego County Jail (“the Jail”) since June 11, 2021. My booking number is 21120877. I am 43 years old. I am housed at the Vista Detention Facility in unit E-5.

3. I have been diagnosed as bipolar and schizophrenic, and have previously attempted suicide. Attached as **Exhibit A** is an excerpt from the paperwork completed when I was screened into the Jail noting my need for chronic care to manage my mood and psychotic disorders. Despite that note, I only see a mental health clinician once a month at most. When they do come see me, mental health staff at the Jail often come to my cell and ask personal questions in front of other inmates and staff. For example, they ask how I feel and whether I am hearing voices. Because these visits are non-confidential, I do not feel like I can speak openly about my problems. Attached as **Exhibit B** are excerpts from my medical records showing that I was not seen in confidential spaces for mental health encounters on July 14, August 31, and October 20.

4. For example, I met with the clinician on August 31 because I was feeling very depressed and had submitted a request slip saying so. I did not feel comfortable sharing much about what I was really feeling because the meeting was at my cell door and other people could hear our conversation. On October 20, I told the clinician that I wanted to speak in a confidential setting, but that confidential meeting took another three weeks. On December 1, 2021, I protested that a deputy was present for a meeting with a psychiatrist to discuss my medications. I asked to talk privately, but the request was rejected, and my appointment was rescheduled for over a week later. Since then, I have mostly been able to meet with a clinician in a confidential space.

EXHIBITS A-B

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