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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,
 Plaintiffs,

22 v.

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

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

**DECLARATION OF
 CHRISTOPHER NORWOOD 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 CHRISTOPHER NORWOOD

I, Christopher Norwood, 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”) at least fifteen times since 2005. Most recently, I was incarcerated at the Jail from June 22, 2021 to February 9, 2022. My booking number was 21122487. I am now in the custody of the California Department of Corrections and Rehabilitation (“CDCR”) at Wasco State Prison. I am 35 years old.

3. I have been addicted to heroin for over a decade and diagnosed with opioid dependence. In the community, I have been prescribed Suboxone to treat my addiction. Suboxone is a daily medication that helps me manage my cravings for opioids, avoid using heroin, and live a normal functioning life. When I am managing my addiction well, I take Suboxone daily. I was clean and had not used heroin for months when I arrived at the Jail in June 2021.

4. I also have serious mental health needs. I have received inpatient mental health care, and have a history of psychosis, depression, and anxiety. When I arrived at the Jail on June 22, 2021, a mental health clinician only saw me at booking to assess whether I was suicidal. I did not get any treatment then. A few days later, I requested mental health care because I was having anxiety, hearing voices, and was worried that I had not received any treatment for my opioid dependence.

5. I finally saw a mental health clinician for care on July 3, 2021. Attached as **Exhibit A** is a true and correct copy of the assessment form that the Jail mental health clinician completed for that visit, which states that I was seen “with a deputy present.” I remember the clinician came to my cell and talked to me through the cell window. A deputy was standing right outside the cell with the clinician. I

[3888461.2]

1 could not talk fully about my anxiety and my feelings with the deputy standing
2 there, and with other incarcerated people within earshot.

3 6. I told the clinician about my addiction and that I had been sober for 100
4 days. I asked if Suboxone was available because it would help me avoid heroin. I
5 knew from past incarcerations that drugs like heroin, methamphetamine, and
6 fentanyl are widely available in the Jail. That made me especially worried that
7 without Suboxone, I might get cravings and relapse, but the clinician told me I could
8 not get Suboxone in the Jail.

9 7. I really needed Suboxone while incarcerated. Medical records
10 collected and produced by the Sheriff’s Department, attached hereto as **Exhibit B**,
11 state that on July 17, 2021, I overdosed on fentanyl at the Jail and was hospitalized
12 overnight at Sharp Chula Vista Medical Center.

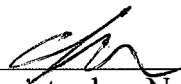
13 8. Even after I returned to the Jail on July 18, I never saw an addiction
14 specialist for the rest of the time I was incarcerated, despite asking the psychiatrist
15 multiple times. I did not see another mental health professional until July 23, 2021,
16 or about three weeks after the first meeting. The Jail did not provide me with
17 Narcotics Anonymous or other substance use education programs. Instead, I had to
18 rely on a sobriety book from outside the Jail and work on my own to try to stay
19 clean and sober. It is not easy in an environment like the Jail where opioids are
20 easily available, and where I have not received adequate treatment for my addiction
21 and mental health needs.

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1 9. I agreed to be a class representative in this case because I want to help
2 improve the medical, dental, and mental health care at the Jail, ensure that
3 incarcerated people with disabilities are accommodated and treated fairly, and help
4 make the Jail safe and secure for all incarcerated people. I have been cooperating
5 fully with my counsel and am responding to all requests for information to the best
6 of my ability and recollection, and will continue to do so in the future. My lawyers
7 keep me updated on the progress of this case, and I will review all materials
8 provided to me and provide my input to the best of my ability. When I have
9 questions about the case, I will ask the attorneys for help to understand everything to
10 the best of my ability.

11 I declare under penalty of perjury under the laws of California and the United
12 States of America that the foregoing is true and correct, and that this declaration is
13 executed at Wasco, California this 19th day of April, 2022.

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16 _____
17 Christopher Norwood
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EXHIBITS A-B

Filed Under Seal