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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 DION
 SCOTT BUCKELEW 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 DION SCOTT BUCKELEW

I, Dion Scott Buckelew, 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 May 13, 2019. I am housed at George Bailey Detention Facility. My booking number is 19729940. I am 50 years old.

3. The Jail is not a safe place for people with physical disabilities.

4. I use a wheelchair to get around. I am currently housed in a Medical Observation Bed (“MOB”) unit, which is a dorm-like setting with sets of two-man bunk beds lining the floor. There is a communal bathroom and shower in the unit.

5. I cannot fit my wheelchair through the doors of the communal bathroom. I also can hardly fit my wheelchair between the rows of bunk beds. I have to rely on other incarcerated people to fold up my wheelchair and help me transfer from my bunk bed, to my wheelchair, and to the bathroom. Deputies do not provide me with any assistance. I have been fortunate that some people have been willing to help me, but I am worried that they will eventually see me as a burden and I will not receive the help I need.

6. In order to shower, I have to transfer into a flimsy plastic shower chair. Deputies do not provide me with any assistance. I have fallen multiple times when trying to transfer from my wheelchair into the shower chair. I am worried that one day I will seriously injure myself when attempting to transfer between my wheelchair and the shower chair.

7. I also have had problems accessing dayroom table space. There are only a few sides of the two tables in my unit that fit my wheelchair. The other sides of the tables are either too close to bunks, or too close to the wall, for my wheelchair to fit through. Currently, I am the only person who uses a wheelchair in my unit, which means I am able to access the space. But previously, there were three other

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1 wheelchair users in the unit with me. The limited number of wheelchair accessible
2 spaces meant that we were unable to use the tables all at the same meal time.

3 8. Earlier in my incarceration, I was housed at San Diego Central Jail,
4 including in 5A and 8C. I spent most of my time in 8C. In 8C, like my current unit,
5 there were not enough wheelchair accessible spaces for everyone with a wheelchair
6 to eat at the tables in the dayroom. In 5A, my cell did not have any safety bars for
7 me to use when using the bathroom. The cell housed three people, and there would
8 not have been enough space for all of us even without my wheelchair. There were
9 stools in front of all of the telephones in that unit, which meant that I had to transfer
10 from my wheelchair to the stool to use the telephone. None of the telephone cords
11 were long enough to reach me sitting in my wheelchair. I was scared of falling and
12 hurting myself when transferring from the wheelchair to the stool.

13 9. When I was in 5A, I had to use a plastic chair to sit in while I
14 showered. Deputies would bring me the chair from another room, but would not
15 place it in the shower for me. I was also not given help transferring from my
16 wheelchair to the plastic chair once I had placed the plastic chair in the shower. This
17 meant that I had to try to get from my wheelchair to the plastic chair myself, which
18 was very difficult given my mobility issues. I have fallen several times doing this.


19 10. I submit this declaration because I want to be part of this lawsuit and to
20 make sure people with disabilities at the Jail are safe. I understand this lawsuit was
21 filed in part to help improve the medical, dental, and mental health care at the Jail,
22 ensure that incarcerated people with disabilities are accommodated and treated
23 fairly, and help make the Jail safe and secure for all incarcerated people. I strongly
24 support these goals, as the Jail's facilities currently place people with disabilities at a
25 serious risk of harm.

26 I declare under penalty of perjury under the laws of California and the United
27 States of America that the foregoing is true and correct, and that this declaration is
28 executed at San Diego, California this 21 day of April, 2022.

[3892085.1]

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DECLARATION OF DION SCOTT BUCKELEW

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Dion Scott Buckelew