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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 GARY
 BARTLETT 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 GARY BARTLETT

I, Gary Bartlett, 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 July 11, 2021. My booking number is 21125464. I am 43 years old. I am housed at the Vista Detention Facility in unit N3. To the best of my recollection, I have been incarcerated at the Jail approximately 50 times over the last 25 years.

3. I have serious mental health needs that have not been treated adequately at the Jail. Attached as **Exhibit A** is a true and correct copy of excerpts from my medical records, showing that the Jail was aware when I booked in on July 11 that I needed chronic care for mood disorders and psychotic disorders. I have put in multiple requests for mental health treatment, including on August 11 and September 13 of last year, and March 9, 2022. My August 11 request, a true and correct copy of which is attached as **Exhibit B**, was labeled “emergency” and noted my PTSD, but I was not seen for almost two weeks. My September 13 request, a true and correct copy of which is attached as **Exhibit C**, said “I need to speak to someone very badly.” I did not get seen until October 6, in a non-confidential visit from the psychiatrist. The psychiatrist primarily talks to me about medication. I do not get any therapy. In administrative segregation, I get short visits at my cell door from a clinician, but those are just wellness checks and are very brief. A deputy is with the clinician so I do not feel comfortable having therapy with the deputy there. I believe that only certain incarcerated persons are given confidential visits with mental health professionals, but I am not. Since I was booked, I have not been able to have a confidential visit with any mental health professional.

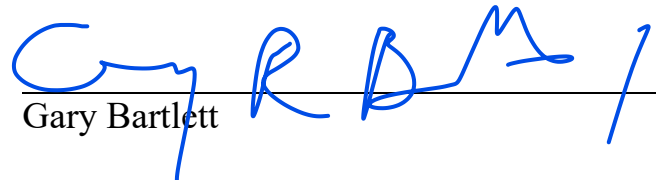
4. On March 9, 2022, I put in a new request to talk to someone about my PTSD, but as of this date I have still not been able to talk to a therapist in a confidential setting.

1 5. I was bitten on my cheek by a police dog during my arrest, so
2 immediately afterwards, I was taken to Palomar Hospital for treatment. I was then
3 booked at Vista. The hospital told me that the stitches needed to be removed within
4 8 to 10 days. I told the Jail about this, including by telling nurses. The nurses kept
5 saying that they would get to me or that I was scheduled, but medical did not
6 remove the stiches until about 3 weeks after I came to Vista, on July 29. Attached
7 as **Exhibit D** is a true and correct copy of an excerpt from my Jail medical records,
8 which indicates that my Palomar records were not reviewed until that day. Because
9 by that point the skin on my cheek had started to heal over the stitches, it was very
10 painful when I finally had them removed.

11 6. I have been in administrative segregation for over three months. The
12 cell is covered in black mold, particularly on the ceiling. The toilets also do not
13 flush properly, which means feces sit in the toilet for long periods of time,
14 contributing to the filthy conditions.

15 7. I submit this declaration because I want to be a part of this litigation
16 and help improve the medical and mental health care at the Jail for all incarcerated
17 people. I have seen other vulnerable inmates experience similar issues I have
18 experienced, and I believe our rights have been violated.

19 I declare under penalty of perjury under the laws of the United States of
20 America that the foregoing is true and correct, and that this declaration is executed
21 at SAN DIEGO, California this 18 day of April, 2022.

22
23 
24 Gary Bartlett

EXHIBITS A-D

Filed Under Seal