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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 KATRINA
 RIOS 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 KARINA GORGET RIOS

I, Karina Gorget Rios, 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 3, 2021. My booking number is 21119832. I am 28 years old.

3. The Jail’s mental health care is inadequate. I suffer from anxiety and depression. I am only able to see a psychiatrist once a month. Those visits are conducted in a small room with an open door so others passing by can hear what is discussed. This prevents me from being able to communicate openly with the psychiatrist and makes my anxiety worse. The visits are also too short. I usually am only allowed to speak with the psychiatrist for approximately three minutes, which is not enough time for them to understand my mental health condition.

4. Jail staff have also given me the wrong medication. On July 24, 2021, I went to the medical observation unit. I needed to have my urine monitored for 24 hours, but staff did it incorrectly and so I ended up having to stay in medical for three days. As I was leaving on the third morning to return to my housing unit, a nurse told me that I could take my medication immediately instead of at my dorm. I do not take medication in the morning, and I informed the nurse of this. The nurse would not listen and handed me what seemed like ten pills. I knew this was not right because I do not take ten different medications. Again, the nurse would not listen, and I was forced to take the medication. Attached hereto as **Exhibit A** is a true and correct copy of the SOAP note in Jail medical records documenting that I was given the wrong medication. After taking the medication at approximately 7:30 a.m., I returned to my dorm. I watched television for a bit but began feeling very sick. I called the intercom twice. Over an hour passed before a deputy came to see me, and told me “to lie down or eat something.” I tried to explain what had happened to the deputy, but I could not even speak. I was rushed to see the doctor,

1 who told me something like, “you’re the one they accidentally gave psych
2 medication to.” I had to stay in isolation for the whole day and night. It was a
3 really scary experience, and the Jail would not even tell me what medications they
4 accidentally gave me.

5 5. I submit this declaration because I want to be a part of this litigation
6 and help improve the medical and mental health care at the Jail and help make the
7 Jail safe and secure for all incarcerated people.

8 I declare under penalty of perjury under the laws of California and the United
9 States of America that the foregoing is true and correct, and that this declaration is
10 executed at Santee, California this 19 day of April, 2022.

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12 
13 Karina Gorget Rios

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EXHIBIT A
Filed Under Seal