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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 ROBERT
 HOLLON 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 ROBERT HOLLON

I, Robert Hollon, 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 December 26, 2021. I am housed at San Diego Central Jail in module 8C. My booking number is 21150316. I am 51 years old.

3. I have a rare disease called Leber’s disease, or Leber Hereditary Optic Neuropathy. Leber’s caused me to become blind in 2010. I use a seeing eye cane to walk around and also wear protective sunglasses to protect my eyes, as they are extremely sensitive to light. I get severe headaches if my eyes are exposed to light, including the fluorescent lights in the Jail. In the community, I use my seeing eye cane at all times, and I am always wearing my protective sunglasses.


4. I have been incarcerated at the Jail a few times, including since I became blind. One time when I was incarcerated, I believe around 2019, I entered the Jail with my seeing eye cane and protective sunglasses. At the intake screening, the medical staff doing intake took away my seeing eye cane, despite me telling them that I need it to walk around. Instead, they gave me a short, wooden cane with a curved handle. It was the kind of cane that other people in the Jail use for mobility. Staff told me it was a cane for a blind person because it was painted white. The cane was too short to help me and is not designed for people who are blind. It made getting around very difficult. Painting it white did not make a seeing eye cane. I estimate that I was in the Jail for about 60 days having to use that cane.

5. I have been at the Jail this time since late December 2021. After I was booked into the Jail, I asked staff whether I could have an audio player in my housing unit to listen to the Bible and other books. Other incarcerated people who are not blind have access to the Bible and other books. When I was in the Jail a few years ago, I had access to an audio player to listen to the Bible and other books. I

1 kept it in my housing unit and would give it to staff to recharge when the battery
2 died. I also use an audio player in the community to listen to books from the library.
3 However, staff have not let me have an audio player during this incarceration at the
4 Jail. The Jail's response to my request for the audio player is that I can go down to
5 the sixth floor where an audio player is located. But I know that staff will not escort
6 me there every day, especially when movement in the Jail is restricted due to
7 COVID. Other people who are not blind have access to books in their housing
8 units. Jail staff have stopped responding to my grievances about not having access
9 to my audio player. Last week, the week of March 14, I got into a verbal dispute
10 with a deputy, and he said "fuck your eyes and fuck your audio machine."

11 6. During a previous incarceration, I also had access to Braille playing
12 cards and Braille dice, both provided by the blind school I attend. The Jail has not
13 provided them to me this time. Other people can play chess. It is like staff expect
14 me to stare at the wall. I feel disrespected.

15 I declare under penalty of perjury under the laws of California and the United
16 States of America that the foregoing is true and correct, and that this declaration is
17 executed at San Diego, California this 22nd day of March, 2022. Because I am
18 blind I was not able to sign this declaration myself. The declaration was read to me
19 in person by Eric Monek Anderson on March 22, 2022. I understood and verified
20 its contents in full, and authorized Eric Monek Anderson to sign the declaration on
21 my behalf.

22
23 
24 Robert Hollon