

1 GAY CROSTHWAIT GRUNFELD – 121944
 VAN SWEARINGEN – 259809
 2 PRIYAH KAUL – 307956
 ERIC MONEK ANDERSON – 320934
 3 HANNAH M. CHARTOFF – 324529
 ROSEN BIEN GALVAN & GRUNFELD LLP
 4 101 Mission Street, Sixth Floor
 San Francisco, California 94105-1738
 5 Telephone: (415) 433-6830
 Facsimile: (415) 433-7104
 6 Email: ggrunfeld@rbgg.com
 vswearingen@rbgg.com
 7 pkaul@rbgg.com
 eanderson@rbgg.com
 8 hchartoff@rbgg.com

9 AARON J. FISCHER – 247391
 LAW OFFICE OF
 10 AARON J. FISCHER
 2001 Addison Street, Suite 300
 11 Berkeley, California 94704-1165
 Telephone: (510) 806-7366
 12 Facsimile: (510) 694-6314
 Email: ajf@aaronfischerlaw.com

13 *(additional counsel on following page)*

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 WAYLON
 COZART IN SUPPORT OF
 PLAINTIFFS' MOTIONS FOR
 PRELIMINARY INJUNCTION
 AND PROVISIONAL CLASS
 CERTIFICATION**

Judge: Hon. Anthony J. Battaglia

Trial Date: None Set

1 *(counsel continued from preceding page)*

2 CHRISTOPHER M. YOUNG – 163319
3 ISABELLA NEAL – 328323
4 OLIVER KIEFER – 332830
5 DLA PIPER LLP (US)
6 401 B Street, Suite 1700
7 San Diego, California 92101-4297
8 Telephone: (619) 699-2700
9 Facsimile: (619) 699-2701
10 Email: christopher.young@dlapiper.com
11 isabella.neal@dlapiper.com
12 oliver.kiefer@dlapiper.com

13 BARDIS VAKILI – 247783
14 JONATHAN MARKOVITZ – 301767
15 ACLU FOUNDATION OF SAN DIEGO &
16 IMPERIAL COUNTIES
17 2760 Fifth Avenue, Suite 300
18 San Diego, California 92103-6330
19 Telephone: (619) 232-2121
20 Email: bvakili@aclusandiego.org
21 jmarkovitz@aclusandiego.org

22 Attorneys for Plaintiffs
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF WAYLON COZART

I, Waylon Cozart, 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 August 18, 2020. I am housed at George Bailey Detention Facility in housing unit 4A. My booking number is 20932296. I am 26 years old.

3. I have been incarcerated at the Jail before. Deputies do not seem to have any compassion or care for people who come in with substance use issues. Around three or four years ago when I came in, I did not receive withdrawal medication, and I was in a holding tank for two days. The guards were messing with me. I told them I was suicidal, but they would bang on the windows. They laughed at me and made faces at me like they were monsters. I thought that the cops were trying to kill me. I was scared for my life. I also do not feel safe at the Jail because drugs like meth and fentanyl are widely available inside.


4. I have also had trouble getting medical care, including dental care and eyeglasses. I have been requesting dental care for months since I broke my back molar, but I still have not had treatment. They are constantly telling me I am scheduled, but it never happens. Earlier, I had to wait more than a year to get eyeglasses after my old glasses broke in 2020. I did not get new eyeglasses until March 7, 2022.

5. I submit this declaration because I want to be a part of this lawsuit. I want to help improve the medical, dental, and mental health care at the Jail, ensure that incarcerated people with disabilities are accommodated and treated fairly, and help make the Jail safe and secure for all incarcerated people.

6. I have trouble getting in touch with my attorney. To get a confidential call with my attorney, he has to call and request a callback, and then the deputies tell me about the callback. Recently, I got notified of an attorney callback at 9:30 p.m.

1 I called my attorney and he was sleeping. He told me he had been trying to reach
2 me since 10 a.m. and had made five calls. I do not know why the Jail did not tell me
3 about his calls until 9:30 at night, after business hours, when apparently he had been
4 calling for a long time before then.

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

8
9 
10 _____
11 Wylon Cozart
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28