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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

**NOTICE OF MOTIONS AND
MOTIONS FOR PRELIMINARY
INJUNCTION AND
PROVISIONAL CLASS
CERTIFICATION**

Judge: Hon. Anthony J. Battaglia

Date: June 16, 2022

Time: 2:00 p.m.

Ctrm.: 4A

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Attorneys for Plaintiffs

1 **TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:**

2 PLEASE TAKE NOTICE that on June 16, 2022 at 2:00 PM, before Judge
 3 Anthony J. Battaglia, in the U.S. District Court for the Southern District of
 4 California, Plaintiffs Darryl Dunsmore, Ernest Archuleta, Anthony Edwards,
 5 Reanna Levy, Josue Lopez, Christopher Nelson, Christopher Norwood, and Laura
 6 Zoerner, on behalf of themselves and all other similarly situated, will move for a
 7 preliminary injunction and for provisional class certification (“the Motions”).

8 The Motions will be based on this notice; the accompanying memorandum of
 9 points and authorities; the accompanying request for judicial notice and associated
 10 exhibits; the declarations of Van Swearingen, Gay Grunfeld, James Austin, Pablo
 11 Stewart, Robert Cohen, Syroun Sanossian, Christine Evans, Jennifer Alonso,
 12 Anthony Ray Edwards, Cedrick Jones, Christopher Nelson, Christopher Norwood,
 13 Daniel Webb, Darryl Lee Dunsmore, David Francis Smith III, Dion Scott Buckelew,
 14 Dylan Lacroix, Ernest Archuleta, Gary Bartlett, Gustavo Sepulveda, Isaiah Glenn,
 15 James Clark, Jose Antonio Lopez, Joshua Roberts, Josue Lopez, Katrina Rios,
 16 Mark Baker, Michael Keavney, Nikki Yach, Reanna Levy, Robert Hollon, and
 17 Waylon Cozart, and associated exhibits; any evidence and argument presented at the
 18 hearing on the Motions, and all other papers and pleadings on file in this action.

21 DATED: May 2, 2022

Respectfully submitted,

ROSEN BIEN GALVAN & GRUNFELD LLP

By: /s/ Van Swearingen

Van Swearingen

Attorneys for Plaintiffs