

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

**REPLY DECLARATION OF
 JUSTIN CHRISTIANSEN IN
 SUPPORT OF PLAINTIFFS'
 MOTIONS FOR PRELIMINARY
 INJUNCTION AND
 PROVISIONAL CLASS
 CERTIFICATION**

Judge: Hon. Anthony J. Battaglia

Date: August 11, 2022

Time: 2:00 p.m.

Ctrm.: 4A

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

(counsel continued from preceding page)

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

BARDIS VAKILI – 247783
JONATHAN MARKOVITZ – 301767
ACLU FOUNDATION OF SAN DIEGO &
IMPERIAL COUNTIES
2760 Fifth Avenue, Suite 300
San Diego, California 92103-6330
Telephone: (619) 232-2121
Email: bvakili@aclu-sdic.org
jmarkovitz@aclu-sdic.org

Attorneys for Plaintiffs

DECLARATION OF JUSTIN CHRISTIANSEN


I, Justin Christiansen, 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 April 17, 2022. I am housed at the George Bailey Detention Facility in unit 1B. My booking number is 22715783. I am ~~38~~⁴² years old.

My friend and bunkmate Jerry Aleman overdosed at George Bailey in April 2021. He was not an opiate user, but for some reason tried it that day. I was laying on my bunk when I heard a commotion all around me. I saw that Jerry had fallen in between the bunks. I ran over to him right away. I gave him chest compressions and we took turns giving him CPR. Multiple people pushed the emergency call buttons, but no one responded. People were yelling "man down" and "help", but still no one responded. It was at least 45 minutes until the deputies came into the dorm. By that time, Jerry's lips had turned blue. The deputies didn't try to do CPR and just carried Jerry out. As they went down the stairs, Jerry's head slipped down and hit the last couple of steps. It was horrible to watch, especially to a friend. That was the last time I ever saw Jerry. I personally have never used opiates, but on the outside I regularly carry Narcan with me. I have lost friends and my father to overdoses, and I never want to see that happen again. If Narcan was available to me on the day Jerry overdosed, I would have used it in a heartbeat to try to save his life.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration is executed at George Bailey, California this 3 day of June 2022.


Justin Christiansen

