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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,  
 Plaintiffs,

22 v.

23 SAN DIEGO COUNTY SHERIFF'S  
 DEPARTMENT, COUNTY OF SAN  
 24 DIEGO, CORRECTIONAL  
 HEALTHCARE PARTNERS, INC.,  
 25 LIBERTY HEALTHCARE, INC., MID-  
 AMERICA HEALTH, INC., LOGAN  
 26 HAAK, M.D., INC., SAN DIEGO  
 COUNTY PROBATION DEPARTMENT,  
 27 and DOES 1 to 20, inclusive,  
 28 Defendants.

Case No. 3:20-cv-00406-AJB-WVG

**REPLY DECLARATION OF  
 JOSEPH LEWIS 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

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**DECLARATION OF JOSEPH LEWIS**

I, Joseph Lewis, 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 October 4, 2021. I am housed at the George Bailey Detention Facility in unit 4A. My booking number is 21138670. I am 65 years old.

3. I previously have been incarcerated in the Jail approximately 30 separate times.

4. I am addicted to opioids. I was under the influence of opioids when I was booked into the Jail. For about seven days after booking, I experienced severe withdrawals that made me extremely sick. For example, I was in pain and could not hold my bowels. During that entire time, no medical staff ever came to see me. When officers passed by my cell, I begged for help, but they would say things like, “talk to me on next count” or “it’s the end of my shift so talk to the next guy.” I was given a “kick pack” at intake, but all it contained was Motrin and Librium, neither of which helped with my severe opioid withdrawals.

5. I have submitted medical slips asking to receive an opioid blocker like Suboxone, which I believe could help address my addiction and cravings. My requests have been denied because I was not receiving this type of medication on the streets before my incarceration. I have not received any other medication or counseling for my addiction while at the Jail.

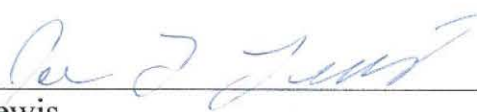
6. I am housed in a protective custody unit because I am considered a prison gang drop-out. Based on my experiences in the protective custody unit at the Jail, I believe many people are placed in protective custody who should not be there. Incarcerated people with serious mental illnesses are called “J-Cats” by others in the Jail. I have seen J-Cats in protective custody who do things like bang their heads against the walls, talk to imaginary people, throw food trays, and refuse basic

[3923998.2]

1 hygiene. J-Cats are vulnerable to violence at the hands of other incarcerated people  
2 who are placed in protective custody, such as those who are there because they are  
3 or want to be associated with prison gangs. For example, I heard a J-Cat kick the  
4 door to his cell for three hours straight and other people in protective custody who  
5 were trying to read, sleep, or do legal work at the time beat him up. Placing J-Cats  
6 in protective custody is dangerous for them because they can get beaten up, and it  
7 puts everyone else at risk of picking up another prison term for hurting a J-Cat.

8 7. I submit this declaration because I want to help improve the medical,  
9 dental, and mental health care at the Jail, ensure that incarcerated people with  
10 disabilities are accommodated and treated fairly, and help make the Jail safe and  
11 secure for all incarcerated people.

12 I declare under penalty of perjury under the laws of the United States of  
13 America that the foregoing is true and correct, and that this declaration is executed  
14 at G.B.D.F., California this 2 day of JUNE 2022.

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