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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

**REPLY DECLARATION OF  
 DARCELL MOORE 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.

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**DECLARATION OF DARCELL MOORE**

I, Darcell Moore, 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 16, 2020. I am housed at the George Bailey Detention Facility in unit 6C. My booking number is 20919012. I am 41 years old. → DM

3. I have been incarcerated at the Jail approximately 62 times since 1998. Many of those were brief periods of incarceration which I spent in the “drunk tank” at San Diego Central Jail.

4. It is well known that there are areas in this facility that are not monitored by any staff. ~~DM~~ DM There is area in the housing unit called “the pocket” or “the cut,” which is where incarcerated people, who are usually outnumbered, are regularly jumped or beat up by other incarcerated people. There are no consequences for this violence. I have been beaten up in the pocket.

5. I am willing to be a Plaintiff in this lawsuit. I submit this declaration because 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.

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 G.B.D.F., California this 6 day of 2 2022.

  
\_\_\_\_\_  
Darcell Moore

[3924010.2]