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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
 FRANK ROSS 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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Attorneys for Plaintiffs

DECLARATION OF FRANK ROSS

I, Frank Ross, 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 July 13, 2021. I am housed at San Diego Central Jail in the medical unit on floor 3. My booking number is 21125767. I am 56 years old.

3. I am a military veteran. I served in the United States Marine Corps. I have mental health issues resulting from my service, including post-traumatic stress disorder (“PTSD”). I have been diagnosed with pulmonary fibrosis. I have trouble breathing on my own, so I use an oxygen tank.

4. I am aware that Vista has a unit set aside for veterans, with programs specific to the issues that veterans face. However, around the time when I entered the Jail last year, I was informed by Jail staff that I cannot be housed in the veterans unit at Vista because I use an oxygen tank. It does not make any sense to me why the veterans’ unit is not accessible to me or veterans who have disabilities, especially for issues resulting from our service. I wish that I could be housed in the veterans unit. At Central Jail, I have had no access to programs. I get out to the yard very rarely, and there is no education or church.

5. I have had problems using the intercom system at the Jail to get assistance for medical emergencies. Recently, on May 22, 2022, I had tightness in my chest, so I pushed the intercom button and said that I was having an emergency. No one responded either verbally or by coming to my cell. A few minutes later, I pushed the button a second time because my chest was still tight and I was worried about what was happening. No one responded. Several minutes later, I stood up to go to the bathroom and fell to the floor, injuring my left arm. I used my cane to push the button a third time. No one responded. I finally saw a deputy passing by on his rounds and was able to get his attention. I was later taken to the hospital,

1 where I learned that I had suffered a stroke. I worry that the intercom is not a
2 reliable way to get assistance, even when I am having a medical emergency.

3 6. I want to be involved in this litigation to help improve the medical,
4 dental, and mental health care at the Jail, ensure that incarcerated people with
5 disabilities are accommodated and treated fairly, and help make the Jail safe and
6 secure for all incarcerated people.

7 I declare under penalty of perjury under the laws of California and the United
8 States of America that the foregoing is true and correct, and that this declaration is
9 executed at SAN DIEGO, California this 2 day of June, 2022.

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12 Frank Ross

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