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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
 CHAD TUCKER 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 CHAD TUCKER

I, Chad Tucker, 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 November 26, 2019. I am housed at the George Bailey Detention Facility in unit 3A. My booking number is 19773790. I am 46 years old. I previously have been incarcerated at the Jail approximately 10 to 15 times, and about three times in the last decade.

3. I suffer from serious mobility issues. I have a crushed disc in my L5 lumbar vertebrae. Doing something as simple as putting on my socks can cause excruciating pain in my back. I also have a titanium rod in my ^{tibia and an unstable} ~~knee that gives out~~ ~~and affects my balance~~ and affects my balance. My back issues are so bad that at times, I have to rely on my cellmate to help me get off the toilet. I do not want to rely on other incarcerated people for things like this. This is not the environment to be viewed as weak or to trust that others will help you when you need it.

4. ~~From approximately [redacted] to [redacted]~~ I put in at least three or four medical requests and at least two grievances asking for a soft shoe chrono so I could receive softer shoes that would pad my footsteps and relieve some of the pain I feel when walking. No one responded to my requests for months. When a doctor finally came to see me, on approximately Feb. 22, 2022, he denied my request. He said that he did not think I was being honest and that soft shoe chronos were only for people who had experienced strokes. The doctor suggested that I just alter my shoes myself, but that would be a violation of the Jail's rules because it would be considered contraband. A deputy was standing next to the doctor during this visit. I would like to be able to discuss my medical issues without deputies present, so that I can freely discuss my health with medical providers without deputies knowing my medical issues.

1 5. I have requested a lower tier/lower bunk chrono so that I do not have to
2 climb stairs or a bunk. To my knowledge, the Jail has not provided this chrono in
3 my records. I am on the lower tier for now, but I could be bumped from my bed at
4 any time if a person with a verified disability and lower tier/lower bunk chrono is
5 transferred into the unit.

6 6. I have received an endoscopy at UCSD Hospital confirming a problem
7 in my esophagus. It causes heartburn and causes stomach acid to move into my
8 lungs. When I lie down, I aspirate. I often wake up choking and coughing, with a
9 burning sensation in my throat and chest. I have asked to see my medical reports to
10 better understand the issue, but I have not been allowed to do so. Medical staff has
11 given me heartburn medication, but it does not treat the issue. I tried to put in about
12 9 or 10 requests for a foam wedge or double mattress chrono so that I could elevate
13 my upper body when I sleep to help ease my esophageal issues. I finally was given
14 a bed pad that I can roll up to elevate, but the angle isn't right, so it doesn't really
15 help with my esophageal problem.

16 7. When I was housed at South Bay Detention Facility, I slipped and fell
17 multiple times in the shower. The showers had tiles, and when they were bleached,
18 they became very slippery. There were not benches or chairs available.

19 8. I am willing to be a Plaintiff in this lawsuit. I submit this declaration
20 because I want to help improve the medical, dental, and mental health care at the
21 Jail, ensure that incarcerated people with disabilities are accommodated and treated
22 fairly, and help make the Jail safe and secure for all incarcerated people.

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

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Chad Tucker