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7 *Jeremy Smith, Robert Gamez, Maryanne Chisholm,*
8 *Desiree Licci, Joseph Hefner, Joshua Polson, and*
Charlotte Wells, on behalf of themselves and all others
similarly situated

9 **[ADDITIONAL COUNSEL LISTED ON**
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15
16 UNITED STATES DISTRICT COURT

17 DISTRICT OF ARIZONA

18 Victor Parsons; Shawn Jensen; Stephen Swartz;
Dustin Brislan; Sonia Rodriguez; Christina
19 Verduzco; Jackie Thomas; Jeremy Smith; Robert
Gamez; Maryanne Chisholm; Desiree Licci; Joseph
20 Hefner; Joshua Polson; and Charlotte Wells, on
behalf of themselves and all others similarly
21 situated; and Arizona Center for Disability Law,
Plaintiffs,

22 v.

23 David Shinn, Director, Arizona Department of
Corrections; and Richard Pratt, Division Director,
24 Division of Health Services Contract Monitoring
Bureau, Arizona Department of Corrections, in their
25 official capacities,

26 Defendants.

No. CV 12-00601-PHX-ROS

DECLARATION OF
MAYA S. ABELA

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1 I, Maya S. Abela, declare:

2 1. I am an attorney licensed to practice before the courts of the State of Arizona.
3 I am a supervisory attorney at the Arizona Center for Disability Law (“ACDL”), and an
4 attorney of record for the plaintiff ACDL in this litigation.

5 2. As noted in my previous declaration (Doc. 3524 at 2 ¶ 6), I visited ASPC-
6 Florence South Unit on March 11, 2020. I directed escort staff to take photographs
7 documenting the lack of soap and soap dispensers in a bathroom on South Unit. Attached
8 as **Exhibit 1** hereto are true and correct copies of the photographs that Defendants Bates-
9 stamped ADCM1603603-04 and produced to Plaintiffs’ counsel on March 18, 2020.

10 3. As noted in my previous declaration (Doc. 3524 at 3 ¶ 13), I visited the D and
11 E yards of North Unit on March 12, 2020. I directed escort staff to take photographs
12 documenting the leaking roofs, including plastic sheeting rigged up in an attempt to stop
13 leaks, and conditions in the North Unit D and E yard tents. Attached as **Exhibit 2** hereto
14 are true and correct copies of the photographs that Defendants Bates-stamped
15 ADCM1603621-25, ADCM1603635-36, ADCM1603641-42, ADCM1603650-55 and
16 produced to Plaintiffs’ counsel on March 18, 2020.

17 4. As noted in my previous declaration (Doc. 3524 at 4 ¶ 14), I visited the
18 bathroom facilities on the D yard of North Unit. I directed escort staff to take photographs
19 documenting the general conditions of these facilities, including the urinals, toilets, sinks,
20 and showers, and the lack of soap and soap dispensers in the bathroom. Attached as **Exhibit**
21 **3** hereto are true and correct copies of the photographs that Defendants Bates-stamped
22 ADCM1603626-34, and produced to Plaintiffs’ counsel on March 18, 2020.

23 5. As noted in my previous declaration (Doc. 3524 at 4 ¶ 14), I visited the
24 bathroom facilities on the E yard of North Unit. I directed escort staff to take photographs
25 documenting the general conditions of the facilities, including the urinals, toilets, sinks, and
26 showers, and the lack of soap and soap dispensers in the bathroom. Attached as **Exhibit 4**
27 hereto are true and correct copies of the photographs that Defendants Bates-stamped
28

1 ADCM1603620, ADCM1603643, ADCM1603644-49 and produced to Plaintiffs' counsel
2 on March 18, 2020.

3 I declare under penalty of perjury that the foregoing is true and correct.

4 Executed March 20, 2020, in Tucson, Arizona.

5
6 /s/ Maya Abela
7 Maya Abela
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CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2020, I electronically transmitted the above document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

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EXHIBIT 1





EXHIBIT 2





























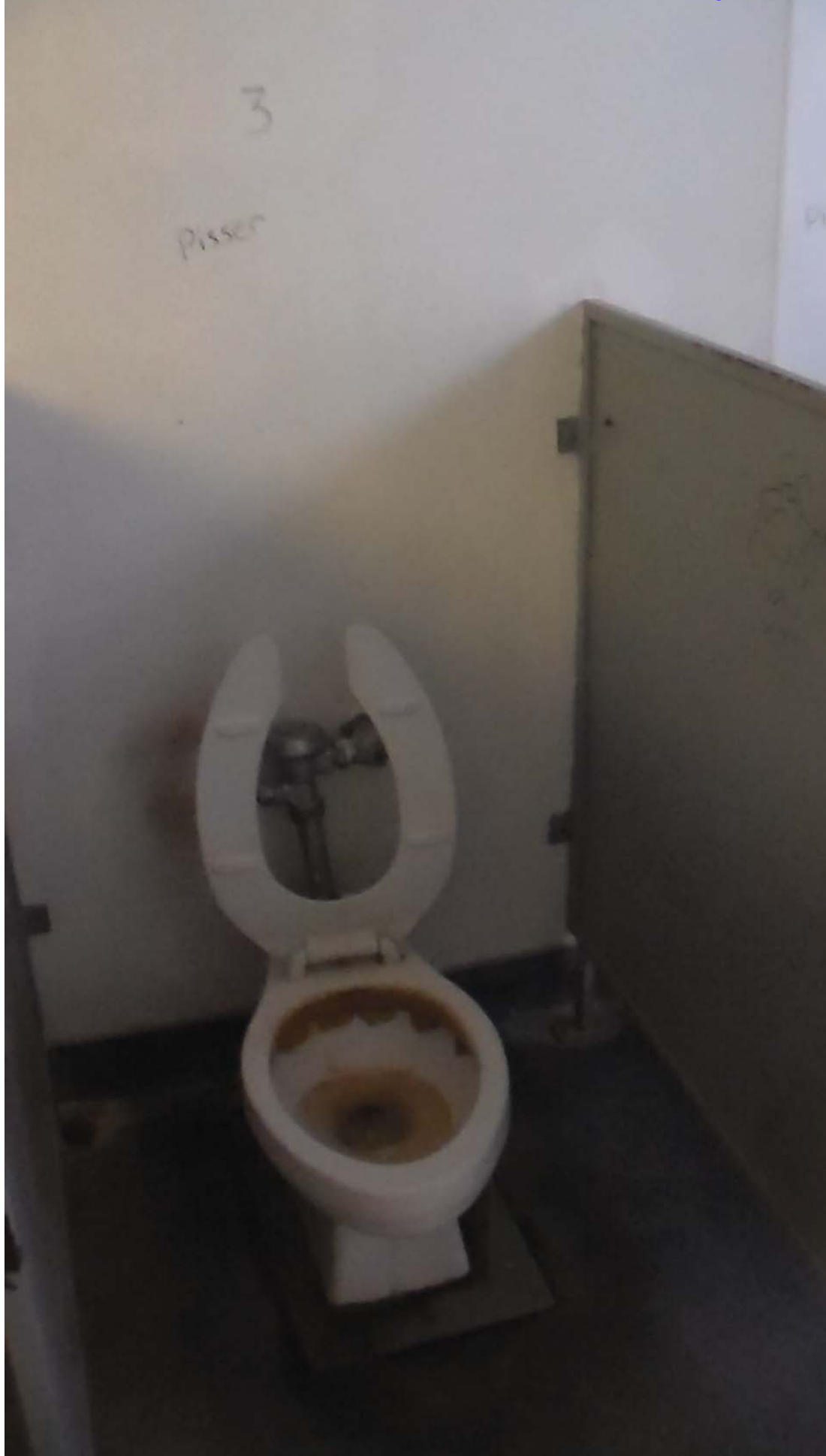


EXHIBIT 3

















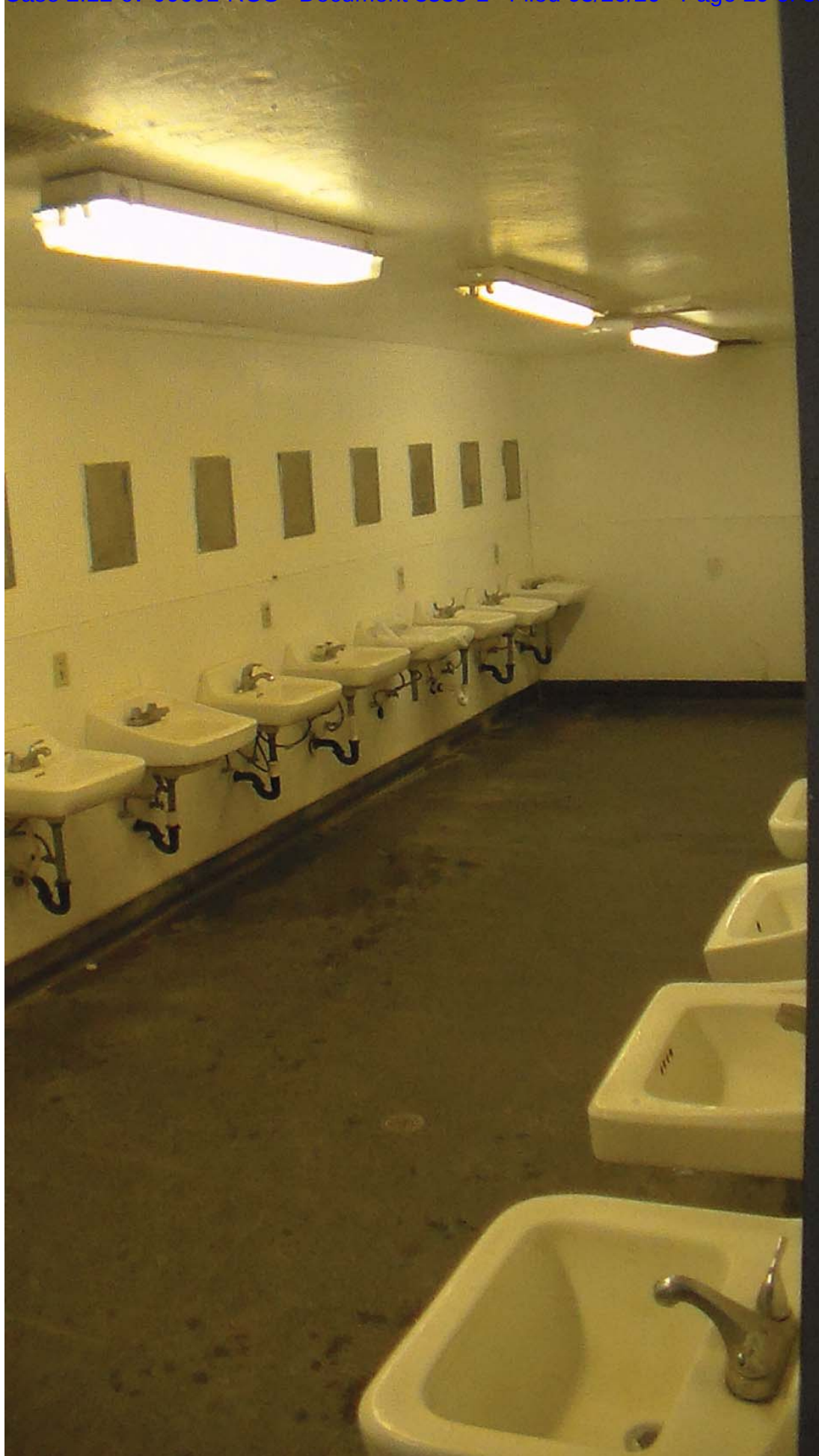


EXHIBIT 4



