

**PRISON LAW OFFICE**  
DONALD SPECTER (SBN 83925)  
dspecter@prisonlaw.com  
SARA NORMAN (SBN 189536)  
snorman@prisonlaw.com  
1917 Fifth Street  
Berkeley, California 94710  
Telephone: (510) 280-2621  
Fax: (510) 280-2704

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
EASTERN DIVISION – RIVERSIDE

QUINTON GRAY, et al., on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

v.

COUNTY OF RIVERSIDE,  
Defendant.

Case No. EDCV13-0444 VAP (OP)

**CLASS ACTION**

**DECLARATION OF SARA  
NORMAN IN SUPPORT OF  
PLAINTIFFS’ EMERGENCY  
MOTION TO ENFORCE OR  
MODIFY THE CONSENT DECREE**

Judge: Hon. Virginia A. Phillips  
Date: To be determined  
Time: To be determined  
Courtroom: Telephonic

**DECLARATION OF SARA NORMAN**

I, Sara Norman, declare:

1. I am an attorney duly admitted to practice before this Court. I am the managing attorney at the Prison Law Office, counsel of record for Plaintiffs in *Gray v. Riverside*. I have personal knowledge of the facts set forth herein, and if called as a witness, I could competently so testify. I make this declaration in support of Plaintiffs’ Emergency Motion.

1           2.       Attached hereto as Exhibit A is a true and correct copy of Executive  
2 Order N-33-20, issued by Governor Gavin Newsom on March 19, 2020, available at  
3 <https://covid19.ca.gov/img/Executive-Order-N-33-20.pdf>.

4           3.       Attached hereto as Exhibit B is a true and correct copy of a news article  
5 dated March 23, 2020 from KQED entitled “California Prisons Are a ‘Tinderbox of  
6 Potential Infection,’ Former CDCR Secretary Warns,” available at  
7 [https://www.kqed.org/news/11808282/california-prisons-are-a-tinderbox-of-](https://www.kqed.org/news/11808282/california-prisons-are-a-tinderbox-of-potential-infection-former-cdcr-secretary-warns)  
8 [potential-infection-former-cdcr-secretary-warns](https://www.kqed.org/news/11808282/california-prisons-are-a-tinderbox-of-potential-infection-former-cdcr-secretary-warns).

9           4.       Attached hereto as Exhibit C is a true and correct copy of a news article  
10 dated March 25, 2020 from Pew Trusts entitled “‘Prisons Are Bacteria Factories’;  
11 Elderly Most at Risk,” available at [https://www.pewtrusts.org/en/research-and-](https://www.pewtrusts.org/en/research-and-analysis/blogs/stateline/2020/03/25/prisons-are-bacteria-factories-elderly-most-at-risk)  
12 [analysis/blogs/stateline/2020/03/25/prisons-are-bacteria-factories-elderly-most-at-](https://www.pewtrusts.org/en/research-and-analysis/blogs/stateline/2020/03/25/prisons-are-bacteria-factories-elderly-most-at-risk)  
13 [risk](https://www.pewtrusts.org/en/research-and-analysis/blogs/stateline/2020/03/25/prisons-are-bacteria-factories-elderly-most-at-risk).

14           5.       Attached hereto as Exhibit D is a true and correct copy of a newspaper  
15 article from the Los Angeles Times, entitled “Riverside Sheriff’s Department Loses  
16 Two Deputies in 24 Hours,” found at [https://www.latimes.com/](https://www.latimes.com/california/story/2020-04-03/riverside-sheriffs-department-loses-two-deputies-in-24-hours)  
17 [california/story/2020-04-03/riverside-sheriffs-department-loses-two-deputies-in-24-](https://www.latimes.com/california/story/2020-04-03/riverside-sheriffs-department-loses-two-deputies-in-24-hours)  
18 [hours](https://www.latimes.com/california/story/2020-04-03/riverside-sheriffs-department-loses-two-deputies-in-24-hours) (last viewed April 5, 2020).

19           6.       On March 16, 2020, I called Deputy County Counsel Jeb Brown,  
20 counsel for Defendant, to relay my concerns about the potential for a significant  
21 outbreak of COVID-19 in the Riverside jails. We agreed that I would memorialize  
22 my concerns in a letter. Attached hereto as Exhibit E is a true and correct copy of  
23 the letter I sent to Mr. Brown on March 16, 2020, following our phone call.

24           7.       Attached hereto as Exhibit F is a true and correct copy of the written  
25 response I received from Mr. Brown on March 22, 2020: the copy of my letter, with  
26 responses interspersed.

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1           8.       Attached hereto as Exhibit G is a true and correct copy of the email I  
2 sent to Mr. Brown on March 22 with follow-up questions to his letter. I have not  
3 received any substantive written responses to these questions, nor have I had any  
4 discussions with County officials regarding COVID-19 in the jails or received any  
5 plans or any other documents in writing, despite repeated requests.

6           9.       Attached hereto as Exhibit H is a true and correct copy of an email I  
7 sent to Mr. Brown and to Court experts Dr. Allen and Dr. Gage on March 28, 2020.

8           10.      Attached hereto as Exhibit I is a true and correct copy of an email I sent  
9 to Mr. Brown and to Court experts Dr. Allen and Dr. Gage on March 30, 2020. I  
10 have not had a substantive response from the County to either email (of March 28 or  
11 March 30) to date.

12          11.      Attached hereto as Exhibit J is a true and correct copy of the  
13 Supplemental Report of Scott Allen, medical expert to the Court, emailed to both  
14 parties on March 30, 2020, including a plan he referred to in his report and attached  
15 to his email.

16          12.      Attached hereto as Exhibit K is a true and correct copy of the  
17 Supplemental Report of Dr. Bruce Gage, mental health expert to the Court, emailed  
18 to both parties on March 31, 2020.

19          13.      On April 6, 2020, I viewed the website of the Centers for Disease  
20 Control and Prevention, update on cases in the United States (available at  
21 <https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/cases-in-us.html>). I saw  
22 that the website reported 304,826 total cases of COVID-19 in the United States and  
23 7,616 deaths.

24          14.      Attached hereto as Exhibit L is a true and correct copy of the expert  
25 report of Dr. Gage, dated September 2019, provided to the parties in the course of  
26 his monitoring duties under the Consent Decree.

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1           15. Attached hereto as Exhibit M is a true and correct copy of the expert  
2 report of Dr. Gage, dated December 2017, provided to the parties in the course of  
3 his monitoring duties under the Consent Decree.

4           16. Attached hereto as Exhibit N is a true and correct copy of the expert  
5 report of Dr. Gage, dated June 2018, provided to the parties in the course of his  
6 monitoring duties under the Consent Decree.

7           17. Attached hereto as Exhibit O is a true and correct copy of Board of  
8 State and Community Corrections, 2018-2020 Biennial Inspection of Riverside  
9 County Sheriff's Office Jail and Court Holding Facilities, available through the  
10 BSCC website ([http://www.bscc.ca.gov/  
11 s\\_fsolocaldetentionfacilityinspectionreports/](http://www.bscc.ca.gov/s_fsolocaldetentionfacilityinspectionreports/)), specifically at  
12 <https://drive.google.com/file/d/1vYeb29RP8a7tkKHG7ikJoVyxI6sBQIH2/view>.

13           18. Attached hereto as Exhibit P is a true and correct copy of the  
14 monitoring report I provided to Defendant for my jail trip in February 2017,  
15 pursuant to my monitoring powers under the Consent Decree. (Redactions are made  
16 as appropriate to protect the privacy of people who are named in the report.) The  
17 conditions I describe in that report were consistent with the descriptions I heard  
18 from numerous detainees interviewed by the Prison Law Office in December 2019.

19           19. Attached hereto as Exhibit Q is a true and correct copy of the  
20 monitoring report I provided to Defendant for my jail trip in December 2019,  
21 pursuant to my monitoring powers under the Consent Decree. (Redactions are made  
22 as appropriate to protect the privacy of people who are named in the report.)

23           20. Attached hereto as Exhibit R is a true and correct copy of the  
24 monitoring report I provided to Defendant for my jail trip in January 2019, pursuant  
25 to my monitoring powers under the Consent Decree. (Redactions are made as  
26 appropriate to protect the privacy of people who are named in the report.)  
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1           21. Attached hereto as Exhibit S is a true and correct copy of a news  
2 release from the California Department of Corrections and Rehabilitation, dated  
3 March 31, 2020, found at [https://www.cdcr.ca.gov/news/2020/03/31/cdcr-  
4 announces-plan-to-further-protect-staff-and-inmates-from-the-spread-of-covid-19-  
5 in-state-prisons/](https://www.cdcr.ca.gov/news/2020/03/31/cdcr-announces-plan-to-further-protect-staff-and-inmates-from-the-spread-of-covid-19-in-state-prisons/) (last viewed April 6, 2020).

6           22. Attached hereto as Exhibit T is a true and correct copy of an email I  
7 sent to Mr. Brown on March 31, 2020.

8           23. Attached hereto as Exhibit U is a true and correct copy of an email I  
9 sent to Mr. Brown on April 1, 2020.

10          24. Attached hereto as Exhibit V is a true and correct copy of an email I  
11 sent to Mr. Brown on April 3, 2020.

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13           I declare under penalty of perjury under the laws of the United States of  
14 America that the foregoing is true and correct, and that this declaration is executed  
15 at San Francisco, California, this 6<sup>th</sup> day of April, 2020.

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/s/ Sara Norman  
Sara Norman

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