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5 \*Admitted pursuant to Ariz. Sup. Ct. R. 38(d)

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8 *Licci, Joseph Hefner, Joshua Polson, and Charlotte Wells, on behalf of themselves and*  
9 *all others similarly situated*

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13 UNITED STATES DISTRICT COURT

14 DISTRICT OF ARIZONA

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

20 Plaintiff,

21 v.

22 David Shinn, Director, Arizona Department of  
23 Corrections, Rehabilitation and Reentry; and  
24 Larry Gann, Assistant Director, Medical Services  
Contract Monitoring Bureau, Arizona Department  
of Corrections, Rehabilitation and Reentry, in their  
official capacities

25 Defendants.  
26

No. 12-cv-00601-PHX-ROS

**TRIAL DECLARATION OF  
ROBERT JOY**

Trial Date: November 1, 2021  
Time: 9:00 A.M.

1 I, Robert Joy, declare as follows:

2 1. I have been retained by counsel to the Plaintiffs in this matter to serve as an  
3 expert witness in the above referenced matter.

4 2. It is my understanding that the Plaintiffs allege they have received inadequate  
5 medical, dental, and mental health care while incarcerated by the Arizona Department of  
6 Corrections, Rehabilitation & Reentry, and that the conditions of confinement in isolation  
7 units place people living in them at substantial risk of serious harm.

8 3. I have been asked to determine whether ADCRR's healthcare staffing levels  
9 are sufficient and, if not, what adequate staffing, hiring, and allocation numbers should be

10 4. Attached as Exhibit A is a true and correct copy of my expert report and  
11 opinions in this matter.

12 5. Attached as Exhibit B is a true and correct copy of my resume.

13 6. Attached as Exhibit C is a true and correct copy of a list of the documents I  
14 considered in coming to the opinions and conclusions in my expert report.

15 7. I submit this Declaration and attached exhibits for the Court's consideration  
16 during trial.

17 8. I declare that I will testify to the opinions laid out in the Exhibit A to this  
18 Declaration under oath at trial.

19 I declare under penalty of perjury under the laws of the State of California that the  
20 foregoing is true and correct to the best of my knowledge.

21 Dated this 27th day of October 2021 at San Diego, California.

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By:   
Robert Joy

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R. 38(d)

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 27, 2021, 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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