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17

18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA

20

21 JOHN ARMSTRONG, et al.,
22 Plaintiffs,
23 v.
24 GAVIN NEWSOM, et al.,
25 Defendants.

Case No. C94 2307 CW

**DECLARATION OF JACOB J. HUTT
IN SUPPORT OF JOINT STATUS
STATEMENT REGARDING
COMPLIANCE WITH THE COURT'S
DECEMBER 7, 2023 ORDER**

Judge: Hon. Claudia Wilken

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1 I, Jacob J. Hutt, declare:

2 1. I am an attorney duly admitted to practice before this Court. I am a Staff
3 Attorney at the Prison Law Office, counsel of record for Plaintiffs. I have personal
4 knowledge of the facts set forth herein, and if called as a witness, I could competently so
5 testify. I make this declaration in support of Plaintiffs' counsel's position in the SATF
6 Stipulation Joint Statement.

7 **Class Member Declarations**

8 2. A true and correct copy of the declaration of S.C., a hard-of-hearing class
9 member at the California Substance Abuse Treatment Facility and State Prison, Corcoran
10 (SATF), dated August 6, 2024, is attached as **Exhibit 1**.

11 3. A true and correct copy of the declaration of J.K., a hard-of-hearing class
12 member at SATF, dated August 6, 2024, is attached as **Exhibit 2**.

13 4. A true and correct copy of the declaration of L.B., a hard-of-hearing class
14 member at SATF, dated August 6, 2024, is attached as **Exhibit 3**.

15 5. A true and correct copy of the declaration of M.M., a hard-of-hearing class
16 member at SATF, dated August 6, 2024, is attached as **Exhibit 4**.

17 6. A true and correct copy of the declaration of H.C., a hard-of-hearing class
18 member at SATF, dated August 6, 2024, is attached as **Exhibit 5**.

19 7. A true and correct copy of the declaration of C.M., a hard-of-hearing class
20 member at SATF, dated August 15, 2024, is attached as **Exhibit 6**.

21 8. A true and correct copy of the declaration of S.B., a hard-of-hearing class
22 member at SATF, dated August 15, 2024, is attached as **Exhibit 7**.

23 9. A true and correct copy of the declaration of R.W., a deaf class member at
24 San Quentin Rehabilitation Center (SQ), dated August 20, 2024, is attached as **Exhibit 8**.

25 10. A true and correct copy of the declaration of G.E., a hard-of-hearing class
26 member at SATF, dated September 17, 2024, is attached as **Exhibit 9**.

27 11. A true and correct copy of the declaration of Z.H., a deaf class member at
28 SATF, dated September 17, 2024, is attached as **Exhibit 10**.

1 12. A true and correct copy of the declaration of S.R., a deaf class member at
 2 SATF, dated September 17, 2024, is attached as **Exhibit 11**.

3 13. C.M. is a hard-of-hearing class member at SATF. A true and correct copy of
 4 the declaration of C.M., dated September 17, 2024, and with certain information redacted
 5 at Defendants’ request, is attached as **Exhibit 12**.

6 14. S.M. is a hard-of-hearing class member at SATF. A true and correct copy of
 7 the declaration of S.M., dated September 17, 2024, and with certain information redacted
 8 at Defendants’ request, is attached as **Exhibit 13**.

9 15. A true and correct copy of the declaration of C.Q., a deaf class member at
 10 Richard J. Donovan Correctional Facility (RJD), dated September 18, 2024, is attached as
 11 **Exhibit 14**.

12 16. A true and correct copy of the declaration of H.C., a deaf class member at
 13 RJD, dated September 18, 2024, is attached as **Exhibit 15**.

14 17. A true and correct copy of the declaration of A.C., a deaf class member at
 15 SQ, dated September 25, 2024, is attached as **Exhibit 16**.

16 18. A true and correct copy of the declaration of J.S., a hard-of-hearing class
 17 member at Mule Creek State Prison (MCSP), dated October 9, 2024, is attached as **Exhibit**
 18 **17**.

19 **1824s**

20 19. Counsel for Defendants regularly produce copies of CDCR Form 1824
 21 Reasonable Accommodation Request paperwork to Plaintiffs’ counsel. Attached as
 22 **Exhibits 18-62** are true and correct copies of the following 1824s and Reasonable
 23 Accommodation Panel (RAP) responses, when available.

24 Exhibit 18	CDCR 1824 Log No. 522096 submitted by S.B., DNH, SATF (February 19, 2024) and RAP Response (March 19, 2024)
25 Exhibit 19	CDCR 1824 Log No. 534889 submitted by S.B., DNH, SATF (March 17, 2024) and RAP Response (April 10, 2024)
26 Exhibit 20	CDCR 1824 Log No. 539828 submitted by S.B., DNH, SATF

	(March 26, 2024) and RAP Response (April 18, 2024)
Exhibit 21	CDCR 1824 Log No. 530605 submitted by L.B., DNH, SATF (March 6, 2024) and Amended RAP Response (April 26, 2024)
Exhibit 22	CDCR 1824 Log No. SATF-D-21-01598 submitted by L.B., DNH, SATF (October 5, 2021) and RAP Response (November 2, 2021)
Exhibit 23	CDCR 1824 Log No. 498625 submitted by L.B., DNH, SATF (received on December 29, 2023) and RAP Response (January 25, 2024)
Exhibit 24	CDCR 1824 Log No. 590923 submitted by L.B., DNH, SATF (July 10, 2024) and RAP Response (August 9, 2024)
Exhibit 25	CDCR 1824 Log No. 590237 submitted by S.C., DNH, SATF (July 9, 2024) and RAP response (August 7, 2024)
Exhibit 26	CDCR 1824 Log No. 524844 submitted by S.C., DNH, SATF (February 23, 2024) and RAP Response (March 22, 2024)
Exhibit 27	CDCR 1824 Log No. 499490 submitted by S.C., DNH, SATF (December 29, 2023) and RAP Response (January 30, 2024)
Exhibit 28	CDCR 1824 Log No. SATF-A-23-00491 submitted by S.C., DNH, SATF (March 2, 2023) and RAP Response (March 28, 2023)
Exhibit 29	CDCR 1824 Log No. 490926 submitted by J.K., DNH, SATF (December 8, 2023) and RAP Response (January 10, 2024)
Exhibit 30	CDCR 1824 Log No. 543876 submitted by C.M., DNH, SATF (April 3, 2024) and RAP Response (April 24, 2024)
Exhibit 31	CDCR 1824 Log No. 603586 submitted by C.M., DNH, SATF (August 3, 2024) and RAP Response (September 3, 2024)
Exhibit 32	CDCR 1824 Log No. 590266 submitted by M.M., DNH, SATF (July 9, 2024) and RAP Response (August 9, 2024)
Exhibit 33	CDCR 1824 Log No. 511002 submitted by R.W., DPH, SQ (January 24, 2024) and RAP Response (February 23, 2024)
Exhibit 34	CDCR 1824 Log No. 520917 submitted by D.T., DNH, SATF (February 14, 2024) and RAP Response (March 12, 2024)

1 2	Exhibit 35	CDCR 1824 Log No. 500990 submitted by D.T., DNH, SATF (January 3, 2024) and RAP Response (February 1, 2024)
3 4	Exhibit 36	CDCR 1824 Log No. 520316 submitted by G.N., DNH, SATF (January 31, 2024) and RAP response (March 12, 2024)
5 6	Exhibit 37	CDCR 1824 Log No. 492884 submitted by L.J., DPO, SATF (December 12, 2023) and RAP Response (January 12, 2024)
7 8	Exhibit 38	CDCR 1824 Log No. 493631 submitted by L.J., DPO, SATF (December 17, 2023) and RAP Response (January 17, 2024)
9 10	Exhibit 39	CDCR 1824 Log No. 457562 submitted by R.A., DPO, SATF (October 1, 2023) and RAP Response (undated)
11 12	Exhibit 40	CDCR 1824 Log No. 469166 submitted by D.E., SATF (October 24, 2023) and RAP Response (November 21, 2023)
13 14	Exhibit 41	CDCR 1824 Log No. 490965 submitted by R.B., DNH, SATF (December 10, 2023) and RAP Response (January 9, 2024)
15 16	Exhibit 42	CDCR 1824 Log No. 592614 submitted by M.B., DNH, SATF (July 12, 2024) and RAP Response (August 13, 2024)
17 18	Exhibit 43	CDCR 1824 Log No. 508719 submitted by J.F., DNH, SATF (January 20, 2024) and RAP Response (February 21, 2024)
19 20	Exhibit 44	CDCR 1824 Log No. 528488 submitted by R.L., DNH, SATF (March 4, 2024) and RAP Response (March 28, 2024)
21 22	Exhibit 45	CDCR 1824 Log No. 523321 submitted by E.E., DNH, SATF (February 21, 2024) and RAP Response (March 20, 2024)
23 24	Exhibit 46	CDCR 1824 Log No. 520909 submitted by T.K., DNH, SATF (February 3, 2024) and RAP Response (March 13, 2024)
25 26	Exhibit 47	CDCR 1824 Log No. 460315 submitted by T.K., DNH, SATF (October 5, 2023) and RAP Response (November 3, 2023)
27 28	Exhibit 48	CDCR 1824 Log No. 517620 submitted by H.C., DNH, SATF (February 7, 2024) and RAP Response (March 7, 2024)
	Exhibit 49	CDCR 1824 Log No. 505659 submitted by S.S., DNH, SATF (January 13, 2024) and RAP Response (February 15, 2024)
	Exhibit 50	CDCR 1824 Log No. 505665 submitted by J.A.S., DNH, SATF (January 13, 2024) and RAP Response (February 15, 2024)

Exhibit 51	CDCR 1824 Log No. 503894 submitted by J.S., DNH, then at SATF (January 9, 2024) and RAP Response (February 9, 2024)
Exhibit 52	CDCR 1824 Log No. 502652 submitted by C.H., DNH, SATF (December 6, 2023) and RAP Response (February 7, 2024)
Exhibit 53	CDCR 1824 Log No. 499284 submitted by S.F., DNH, SATF (December 29, 2023) and RAP Response (January 31, 2024)
Exhibit 54	CDCR 1824 Log No. 491830 submitted by V.P., DNH, SATF (December 11, 2023) and RAP Response (January 12, 2024)
Exhibit 55	CDCR 1824 Log No. 490909 submitted by A.G., DNH, SATF (December 8, 2023) and RAP Response (January 9, 2024)
Exhibit 56	CDCR 1824 Log No. 490979 submitted by E.P., DNH, SATF (December 8, 2023) and RAP Response (January 9, 2024)
Exhibit 57	CDCR 1824 Log No. 490984 submitted by B.D., DNH, SATF (December 8, 2023) and RAP Response (January 9, 2024)
Exhibit 58	CDCR 1824 Log No. 490952 submitted by D.C., DNH, SATF (December 10, 2023) and RAP Response (January 9, 2024)
Exhibit 59	CDCR 1824 Log No. 490970 submitted by R.Z.W., DNH, SATF (December 8, 2023) and RAP Response (January 9, 2024)
Exhibit 60	CDCR 1824 Log No. 490976 submitted by R.W.W., DNH, SATF (December 8, 2023) and RAP Response (January 9, 2024)
Exhibit 61	CDCR 1824 Log No. 490660 submitted by W.L., DNH, SATF (December 9, 2023) and RAP Response (January 9, 2024)
Exhibit 62	CDCR 1824 Log No. 471979 submitted by R.M., DNH, SATF (October 30, 2023) and RAP Response (November 29, 2023)

Class Member Medical Record Reviews

20. As class counsel in *Armstrong*, I have access to the electronic medical records of class members in CDCR custody.

21. On September 30, 2024, I reviewed the electronic medical record for S.B. and found the following a January 22, 2024 outpatient progress note by PA [REDACTED]

1 [REDACTED] that says he ordered a virtual consult to physical therapy to address S.B.'s upper
2 extremity neuropathy. I also found the following information under the follow-up
3 appointments section of his discharge notes from January 29, 2024: "01/22/24 0:01:00
4 PST, Routine Priority (46-90 days), H/O spinal fusion | Neuropathy of upper extremity
5 associated with cervical spondylosis, cervical radiculopathy/fusion - weekly session for at
6 least 3 sessions, 04/21/24." I also found the refusal form that appears after paragraph 22 of
7 S.B.'s declaration, which appears in his medical record on May 24, 2024. Finally, I saw a
8 note from May 17, 2024, written by MA [REDACTED] that says "specialty
9 clinic officer stated that pt refused to come to CTC for PT appt. will send refusals for today
10 out to get processed."

11 22. On September 30, 2024, I reviewed the electronic medical record for S.C.
12 Under the "Methods of Communication" section of the "ADA/Effective Communication"
13 tab in his file, it lists the following: "SLI: No. Hearing Primary: Hearing Aids. Hearing
14 Secondary: Need Staff to Speak Loudly and Clearly."

15 23. On September 30, 2024, I reviewed the electronic medical record for J.K. In
16 his medical record, I saw a note in his medication administration record (MAR) from
17 August 1, 2024 that says "Not Done: pt failed to report to clinic for noon med line
18 @1309." I found a similar note under August 2, 2024 in his MAR that reads: "Not Given:
19 Patient Refused @2019."

20 24. L.B.'s declaration states he filed an 1824 about announcements in 2021 and
21 received a response dated November 2, 2021. On September 30, 2024, I reviewed his
22 electronic medical record and found documentation indicating an encounter with a hearing
23 aid specialist from May 30, 2019, January 23, 2023, and January 18, 2024. The most
24 recent consultation notes from an encounter with an audiologist that I found were from
25 February 9, 2018. It does not appear from the electronic medical record that L.B. was seen
26 by an audiologist or a hearing aid specialist in response to the 1824 filed on October 5,
27 2021.

28 25. On September 30, 2024, I reviewed the electronic medical record for C.M. In

1 his medical record, I saw a note from December 14, 2023 written by RN [REDACTED] that
2 says “Arrived from county with own eyeglasses, condom cath, and incontinence supplies.
3 DME signed. Temp LB/LT issued. Thank you.” His hearing aids were not listed among his
4 Durable Medical Equipment. His records indicate that he was not identified as having a
5 hearing impairment until January 11, 2024 when P&S [REDACTED] completed a CDCR
6 1845/7410 form that states: “DNH-has a hearing impairment and uses assistive device to
7 achieve effective communication. Criteria: Assistive hearing device prescribed. Hearing
8 Impaired Vest required while outside cell/bed area when hearing device(s) are not in use.”
9 According to a DME supply receipt authored by MA [REDACTED] that day, he
10 “exchanged mobility vest for a combo vest hearing/ mobility” but did not yet have hearing
11 aids.

12 26. C.M.’s declaration states that he filed an 1824 about announcements on or
13 around April 3, 2024, and received a response dated April 24, 2024. On September 30,
14 2024, I reviewed the electronic medical record and found consultation notes from an
15 encounter with a hearing aid specialist from February 13, 2024, July 23, 2024, and
16 September 17, 2024. It does not appear from the electronic medical record that he was
17 seen by an audiologist or hearing aid specialist in response to the 1824 filed in April 2024.

18 27. C.M.’s records also confirm that he received a hearing aid only for his right
19 ear, and not his left ear, while at Wasco State Prison. The consultation note from February
20 13, 2024, states: “c/o long standing hearing loss RHL w/ hearing aid use. Devices are
21 broken - got them on outside before incarceration. Otoscopy: clear AU. Audiogram:
22 Bilateral mild SNHL. Deliver one Starkey Muse 312 R-201020231 #312 battery
23 w/instructions, case, brush. Pt qualifies for L aid too but I do not have any left today. Pt
24 may transfer facilities, and can receive a L aid there.”

25 28. In the electronic medical record for C.M., I also found a 7362 dated June 9,
26 2024, regarding his hearing aids. The form was scanned into the record on June 11, 2024,
27 and reads: “my hearing aid fell out of my pocket and was found by another I/M who turned
28 it in to C/O [REDACTED] who turned it into medical. Now no one can find it.” A progress note

1 entered by RN [REDACTED] states that C.M.'s onsite audiology clinic with [REDACTED] was
2 conducted on July 23, 2024. I was also able to verify that the Nursing Face-to-Face
3 encounter from July 8, 2024, written by RN [REDACTED] states that the encounter was
4 performed at 17:30 PDT. I similarly confirmed that the MHMD psychiatric progress note
5 from June 21, 2024, written by Psychiatrist [REDACTED] states the encounter was
6 performed at 13:25 PDT.

7 29. Finally, I was able to authenticate the refusal form that appears after
8 paragraph 87 of C.M.'s declaration, which appears in his medical record on May 17, 2024.

9 30. As noted above, on December 12, 2023 and December 17, 2023, L.J., a late
10 class member formerly housed at SATF, filed 1824s about announcements. The first RAP
11 response, dated January 12, 2024, encouraged him to ask for assistance from ADA
12 workers. The second RAP response, dated January 17, 2023, states that he was scheduled
13 for a hearing evaluation by his primary care provider on December 27, 2023, but that it
14 was "[his] responsibility to listen for announcements." On September 30, 2024, I reviewed
15 L.J.'s medical records and was unable to find any hearing evaluation or hearing test
16 following his December 2023 1824 requests. Unfortunately, L.J. succumbed to an
17 infection in June and appears to have never received accommodations for his hearing.

18 Photographs

19 31. The photographs on page 3 of S.C.'s declaration and page 2 of J.K.'s
20 declaration are true and correct copies of two of the photographs produced by counsel for
21 Defendants in response to Plaintiffs' counsel's concerns regarding accessible housing at
22 various prisons during the COVID-19 pandemic. These photographs were labeled by
23 counsel for Defendants as "SATF Pod Layout" and "A3 A Section Dayroom" and are not
24 Bates stamped.

25 32. The photographs on page 7 of R.W.'s declaration are true and correct copies
26 of two of the photographs counsel for Defendants produced in response to Plaintiffs'
27 counsel's October 6, 2020 and October 28, 2020 letters regarding accessible housing
28 concerns at various prisons during the COVID-19 pandemic. These photographs were

1 produced on November 7, 2020, labeled by counsel for Defendants as “SQ 5” and “SQ 9”
2 and are not Bates stamped.

3 33. A team from the Prison Law Office conducted interviews with DPH class
4 members at SATF between March 8-10, 2021, for an *Armstrong* monitoring site visit.
5 During the site visit, the team directed CDCR staff to take photographs of certain areas. On
6 August 3, 2021, counsel for Defendants produced the photographs to Plaintiffs’ counsel.
7 The photographs on page 4 of C.M.’s declaration are true and correct copies of two of the
8 photographs produced by counsel for Defendants. They appear on PDF page 26 and 7 of
9 the document produced by counsel for Defendants with the file name, “SATF March 2021
10 AMT Photos Redacted.” The photos were labeled by counsel for Defendants as “E-5
11 Television and Dot Matrix” and “E-5 Television” and Bates stamped “DEF 0026” and
12 “DEF 0007,” respectively.

13 34. The photographs on pages 5-6 of C.M.’s declaration are true and correct
14 copies of two of the photographs produced by counsel for Defendants following the March
15 2021 SATF site visit. They appear on PDF page 91 and 95 of the document produced by
16 counsel for Defendants with the file name, “SATF March 2021 AMT Photos Redacted.”
17 The photos were both labeled by counsel for Defendants as “E-4 Staircase” and Bates
18 stamped “DEF 0091” and “DEF 0095,” respectively.

19 35. A team from the Prison Law Office and Rosen Bien Galvan & Grunfeld LLP
20 visited SATF on July 8-12, 2024, for an *Armstrong* monitoring site visit. During the site
21 visit, the team directed CDCR staff to take photographs of certain areas. On August 3,
22 2024, counsel for Defendants produced the photographs to Plaintiffs’ counsel. The
23 photograph on page 5 of L.B.’s declaration is a true and correct copy of one of the
24 photographs produced by counsel for Defendants. It appears on PDF page 24 of the
25 document produced by counsel for Defendants with the file name, “SATF July 9 2024
26 AMT Tour Photos Bates Nos. 79-111_Redacted,” was labeled by counsel for Defendants
27 as “IMG_0024(1)- Yard/ Yard walk way away from walls,” and Bates stamped “DEF
28 CDCR 102.”

1 36. The photograph on page 4 of S.C.’s declaration is a true and correct copy of
2 one of the photographs produced by counsel for Defendants following the July 2024 SATF
3 *Armstrong* monitoring site visit. It appears on PDF page 13 of the document produced by
4 counsel for Defendants with the file name, “SATF July 10-11 2024 AMT Tour Photos
5 Bates Nos. 01-44_Redacted,” was labeled by counsel for Defendants as “IMG_1907-
6 Picture of speaker in A2, A section used for announcements,” and Bates stamped “DEF
7 CDCR 013.”

8 37. The photograph on page 6 of S.C.’s declaration is a true and correct copy of
9 one of the photographs produced by counsel for Defendants following the July 2024 SATF
10 *Armstrong* monitoring site visit. It appears on PDF page 1 of the document produced by
11 counsel for Defendants with the file name, “SATF July 11-12 2024 Tour Photos Bates
12 Nos. 45-78_Redacted,” was labeled by counsel for Defendants as “IMG_0001-C8-C
13 Section Scroll Board,” and Bates stamped “DEF CDCR 045.”

14 38. The photograph on page 7 of S.C.’s declaration is a true and correct copy of
15 one of the photographs produced by counsel for Defendants following the July 2024 SATF
16 *Armstrong* monitoring site visit. It appears on PDF page 12 of the document produced by
17 counsel for Defendants with the file name, “SATF July 10-11 2024 AMT Tour Photos
18 Bates Nos. 01-44_Redacted,” was labeled by counsel for Defendants as “IMG_1906-
19 Picture of A2 dry-erase board in B section that may be used by staff to assist hearing
20 impaired incarcerated people,” and Bates stamped “DEF CDCR 012.”

21 39. The photograph on page 11 of C.M.’s declaration is a true and correct copy
22 of one of the photographs produced by counsel for Defendants following the July 2024
23 SATF *Armstrong* monitoring site visit. It appears on PDF page 36 of the document
24 produced by counsel for Defendants with the file name, “SATF July 10-11 2024 AMT
25 Tour Photos Bates Nos. 01-44_Redacted,” was labeled by counsel for Defendants as
26 “IMG_1935-4 o’clock medication release letter,” and Bates stamped “DEF CDCR 036.”

27 40. The photographs on pages 13-14 of C.M.’s declaration are true and correct
28 copies of two of the photographs produced by counsel for Defendants following the July

1 2024 SATF *Armstrong* monitoring site visit. They appear on PDF pages 12 and 37 of the
2 document produced by counsel for Defendants with the file name, “SATF July 10-11 2024
3 AMT Tour Photos Bates Nos. 01-44_Redacted.” The photos were labeled by counsel for
4 Defendants as “IMG_1906-Picture of A2 dry-erase board in B section that may be used by
5 staff to assist hearing impaired incarcerated people” and “IMG_1936-Daily schedule
6 07/11/24 building F1” and Bates stamped “DEF CDCR 012” and “DEF CDCR 037,”
7 respectively.

8 41. The photograph on page 16 of C.M.’s declaration is a true and correct copy
9 of one of the photographs produced by counsel for Defendants following the July 2024
10 SATF *Armstrong* monitoring site visit. It appears on PDF page 1 of the document
11 produced by counsel for Defendants with the file name, “SATF July 11-12 2024 Tour
12 Photos Bates Nos. 45-78_Redacted,” was labeled by counsel for Defendants as
13 “IMG_0001-C8-C Section Scroll Board,” and Bates stamped “DEF CDCR 045.”

14 42. The photographs on page 19 of C.M.’s declaration are true and correct copies
15 of two of the photographs produced by counsel for Defendants following the July 2024
16 SATF *Armstrong* monitoring site visit. They appear on PDF pages 24 and 1 of the
17 document produced by Defendants with the file name, “SATF July 9 2024 AMT Tour
18 Photos Bates Nos. 79-111_Redacted.” The photos were labeled by counsel for Defendants
19 as “IMG_0024(1)- Yard/ Yard walk way away from walls” and “IMG_0001(1)- Out of
20 bound line” and Bates stamped “DEF CDCR 102” and “DEF CDCR 079,” respectively.

21 43. The photograph on page 20 of C.M.’s declaration is a true and correct copy
22 of one of the photographs produced by counsel for Defendants following the July 2024
23 SATF *Armstrong* monitoring site visit. It appears on PDF page 22 of the document
24 produced by counsel for Defendants with the file name, “SATF July 9 2024 AMT Tour
25 Photos Bates Nos. 79-111_Redacted,” labeled by counsel for Defendants as
26 “IMG_0022(1)- Photo of active yard” and Bates stamped “DEF CDCR 100.”

27 44. The photograph on page 23 of C.M.’s declaration is a true and correct copy
28 of one of the photographs produced by counsel for Defendants following the July 2024

1 SATF *Armstrong* monitoring site visit. It appears on PDF page 23 of the document
2 produced by counsel for Defendants with the file name, “SATF July 9 2024 AMT Tour
3 Photos Bates Nos. 79-111_Redacted,” labeled by counsel for Defendants as
4 “IMG_0023(1)- Staff tent on E yard” and Bates stamped “DEF CDCR 101.”

5 45. The photographs attached to A.C.’s declaration as Exhibit A are true and
6 correct copies of the photographs produced by counsel for Defendants on July 12, 2023
7 following the May 2023 San Quentin Rehabilitation Center (SQ) *Armstrong* monitoring
8 site visit. They appear on PDF page 32 and 28 of the document produced by counsel for
9 Defendants with the file name, “SQSP May 2023 Monitoring Tour Photos Bates No. 01-
10 35,” labeled by counsel for Defendants as “SQSP North Block-IMG_3179 VRS Area
11 View from 2nd Tier.JPG” and “SQSP North Block-IMG_3175 VRS Privacy
12 Screens.JPG,” and Bates stamped “DEF CDCR 0032” and “DEF CDCR 0028,”
13 respectively.

14 **Individualized Vision Assessments (SATF Stipulation 5)**

15 46. On August 5, 2024, my colleague Tania Amarillas, an investigator at the
16 Prison Law Office, sent an email to counsel for Defendants raising concerns that the list
17 produced by Defendants purporting to show that as of April 25, 2024, all DPV class
18 members housed at SATF as of February 26, 2024, had either been evaluated by a vision
19 specialist or refused a vision specialist assessment appeared to be incomplete. A true and
20 correct copy of Ms. Amarillas’s email is attached as **Exhibit 69**.

21 47. [This paragraph intentionally left blank.]

22 48. On August 7, 2024, Ms. Amarillas and my colleague Rita Lomio, a Senior
23 Staff Attorney at the Prison Law Office, sent a letter to counsel for Defendants raising
24 concerns related to the individualized vision assessments of blind and low-vision class
25 members at SATF. A true and correct copy of our letter is attached as **Exhibit 70**.

26 49. On August 8, 2024, Ms. Lomio received a response from a Staff Services
27 Analyst with the CDCR Office of Legal Affairs that said: “Your letter contains multiple
28 issues that will require additional time for proper review and response. Based on this

1 assessment, our response will be returned to you as soon as is practicable, considering the
2 complexity of the issues you raise.” A true and correct copy of the Staff Services Analyst’s
3 response is attached as **Exhibit 71**.

4 50. As of October 16 2024, Plaintiffs’ counsel has not received any further
5 response to the August 7, 2024 letter.

6 51. On September 20, 2024, Sharon Garske, Office of the Attorney General, sent
7 an email to Plaintiffs’ counsel and the Court Expert with the subject line, “SATF
8 Stipulation No. 5 (Individualized Vision Assessments).” A true and correct copy of
9 Ms. Garske’s email is attached as **Exhibit 72**.

10 **Effective Communication of Announcements (SATF Stipulation 7)**

11 52. I reviewed the Strategic Offender Management System (henceforth referred
12 to as “SOMS”) Disability Placement Program (henceforth referred to as “DPP”) Roster
13 generated by counsel for Defendants on September 3, 2024 and produced on September 4,
14 2024. As of September 3, 2024, 99% of class members with documented hearing
15 disabilities housed at SATF have a DNH code (401 people), and 1% have a DPH code
16 (three people). All of the class members designated DPH had sign language listed as their
17 primary form of communication.

18 53. Per the California Correctional Health Care Services’ (henceforth referred to
19 as “CCHCS”) own review, the SATF RAP automatically denies requests which medical
20 staff deem are not medically necessary. A true and correct copy of the August 15, 2024,
21 CCHCS SATF Special Review Memorandum is attached as **Exhibit 73**.

22 54. A true and correct copy of SATF Local Operating Procedure 403, “Disability
23 Placement Program,” dated June 19, 2023, is attached as **Exhibit 74**.

24 55. A true and correct copy of SATF Local Operating Procedure 526, “Statewide
25 Kiosk and Tablet Program,” dated June 8, 2022, and the Addendum dated August 22,
26 2022, are attached as **Exhibit 75**.

27 56. On July 26, 2024, Dr. Andrea Bourne, a California state-licensed audiologist,
28 produced an expert report regarding effective communication of announcements for deaf

1 and hard-of-hearing incarcerated people. Plaintiffs' counsel sent Dr. Bourne's report to
2 counsel for Defendants on the same date. A true and correct copy of Dr. Bourne's expert
3 report regarding effective communication of announcements for deaf and hard-of-hearing
4 incarcerated people is attached as **Exhibit 76**.

5 57. On August 26, 2024, Dr. Bourne produced a supplemental expert report to
6 her July 26, 2024, report. Plaintiffs' counsel sent Dr. Bourne's supplemental report to
7 counsel for Defendants on August 26, 2024. A true and correct copy of Dr. Bourne's
8 supplemental expert report is attached as **Exhibit 77**.

9 58. On April 10, 2024, Rita Lomio, Prison Law Office, sent a letter to counsel
10 for Defendants asking that they reconsider denial of L.B.'s request for a speech-to-text
11 device and vibrating watch. A true and correct copy of the letter Ms. Lomio sent is
12 attached as **Exhibit 78**. Ms. Lomio has not received a response to her letter as of
13 September 30, 2024.

14 59. On July 26, 2024, more than three months after Ms. Lomio sent her April 10,
15 2024, letter, she sent a follow-up email to counsel for Defendants again asking that L.B.
16 receive speech-to-text iPad and vibrating watch immediately and that he be assessed by a
17 hearing professional for possible additional accommodations. A true and correct copy of
18 Ms. Lomio's email is attached as **Exhibit 79**. She has not received a response to her email
19 as of September 30, 2024.

20 60. On April 19, 2024, we received a response from Brianne Burkart, CCHCS
21 Office of Legal Affairs, regarding hearing aids available to class members. A true and
22 correct copy of the email exchange is attached as **Exhibit 80**.

23 61. On March 20, 2024, my colleague Skye Lovett, an investigator at the Prison
24 Law Office, and I sent a letter to counsel for Defendants providing feedback on
25 Defendants' proposal for effective communication of announcements. A true and correct
26 copy of our letter is attached as **Exhibit 81**.

27 62. On May 31, 2024, Skye Lovett and I sent a letter to counsel for Defendants
28 summarizing Plaintiffs' counsel's disagreements with Defendants regarding effective

1 communication of announcements for deaf and hard-of-hearing incarcerated people. A true
2 and correct copy of our letter is attached as **Exhibit 82**.

3 63. On July 3, 2024, we received a response from counsel for Defendants to our
4 March 20, 2024, letter detailing our concerns with Defendants' proposal for effective
5 communication of announcements. A true and correct copy of Defendants' letter is
6 attached as **Exhibit 83**.

7 64. On July 18, 2024, we received a response from counsel for Defendants,
8 responding to our May 31, 2024, summary of disagreements. A true and correct copy of
9 Defendants' letter is attached as **Exhibit 84**.

10 65. On August 7, 2024, Sharon Garske, Office of the Attorney General, emailed
11 Rita Lomio, Prison Law Office, regarding Plaintiffs' counsel's questions about
12 Defendants' recently-retained assistive technology expert, ViaPath tablets, and personal
13 notification of announcements. A true and correct copy of those emails is attached as
14 **Exhibit 85**.

15 66. On February 20, 2024, we received a response from Bryan Phillips, Warden,
16 and Dr. Anu Banerjee, CEO, to our summary of findings from the November 2023 SATF
17 monitoring site visit. A true and correct copy of Defendants' letter is attached as **Exhibit**
18 **86**.

19 67. On October 23, 2024, counsel for Defendants produced two training videos
20 to Plaintiffs' counsel. Defendants titled the videos "Incorrect Way to Handle the Situation"
21 and "How the Situation Should Have Been Handled." True and correct copies of the
22 videos are attached as **Exhibits 87-88**.

23 68. On November 29, 2023, my former colleague, Tovah Ackerman, who
24 worked as an investigator at the Prison Law Office, sent an email to Ramon Ruiz, CDCR
25 Office of Legal Affairs, with the subject line, "Plaintiffs' Proposed Agenda for December
26 4 D/HH Workgroup." Ms. Ackerman's email outlined Plaintiffs' counsel's concerns with
27 the training videos counsel for Defendants produced. A true and correct copy of
28 Ms. Ackerman's email is attached as **Exhibit 89**.

1 69. On March 25, 2024, counsel for Defendants responded to Ms. Ackerman’s
2 email, informing Plaintiffs’ counsel of their decision to remove the training videos from
3 the staff training portal. A true and correct copy of Defendants’ email is attached as

4 **Exhibit 90.**

5 70. On September 19, 2024, Rita Lomio, Prison Law Office, sent a letter to
6 Sharon Garske, Office of the Attorney General, regarding improper denials of speech-to-
7 text accommodations at SATF. A true and correct copy of Ms. Lomio’s letter is attached as

8 **Exhibit 91.**

9 71. On August 28, 2024, Sharon Garske, Office of the Attorney General, sent an
10 email to Plaintiffs’ counsel providing information about notifications on ViaPath tablets. A
11 true and correct copy of this email is attached as **Exhibit 92.**

12 72. On September 27, 2024, Skye Lovett and Rita Lomio, Prison Law Office,
13 sent a letter to Tamiya Davis, CDCR Office of Legal Affairs, regarding systemic denials of
14 vibrating watches to DNH class members at SATF. A true and correct copy of their letter
15 is attached as **Exhibit 93.**

16 73. On September 30, 2024, I visited <https://mn.gov/doc/about/policies/>, an
17 official webpage of the Minnesota Department of Corrections, entitled “Policy Manual.” I
18 clicked on a button that says, “Click Here to Review the Department’s Policies.” I then
19 navigated to “Part 2 Incarcerated Person Services and Case Management,” clicked
20 “Section 203 - Case Planning and Management,” and selected Policy No. 203.250,
21 “Modifications for Incarcerated Persons/Residents with Disabilities.” The policy linked to
22 an attachment called “ADA Paging Guidelines.” A true and correct copy of the ADA
23 Paging Guidelines Policy Attachment is attached as **Exhibit 94.**

24 74. On September 30, 2024, I visited the Official Court Electronic Document
25 Filing System for the U.S. District Court of Colorado. I downloaded a copy of the Order
26 Approving Joint Motion to Dismiss and Request to Retain Jurisdiction to Enforcement
27 Settlement Agreement, Dkt. 74, filed August 15, 2022, in *Disability Law Colorado v.*
28 *Colorado Department of Corrections*, Case No. 21-cv-792-RBJ (D. Colo.). A true and

1 correct copy of the order is attached as **Exhibit 95**.

2 75. On September 30, 2024, I visited the Northern District of Illinois – CM/ECF
3 Official Court Electronic Filing System website. I downloaded a copy of Defendant’s
4 Status Report to the Court, Dkt. No. 743, filed April 22, 2022; the Stipulation of
5 Settlement, Dkt. 446-2, filed July 12, 2018; and the Order Granting Final Approval to
6 Class Settlement and Overruling Objections, Dkt. 454, filed July 26, 2018, in *Ralph*
7 *Holmes, et al. v. Rob Jeffreys, et al.*, Case No. 1:11-cv-02961 (N.D. Ill.). True and correct
8 copies of these documents are attached as **Exhibits 96-98**.

9 76. On September 30, 2024, I visited the Eastern District of Kentucky –
10 CM/ECF Official Court Electronic Filing System website. I downloaded a copy of the
11 Settlement Agreement, Dkt. 81-1, filed June 24, 2015; Consent Judgement, Dkt. 81, filed
12 June 24, 2015; and Ninth Semi-Annual Report by the Settlement Monitor, Dkt. 99, filed
13 December 16, 2020, in *Adams & Knights v. Kentucky Department of Corrections*, Case
14 No. 14-cv-0001 (E.D. Ky.). True and correct copies of these documents are attached as
15 **Exhibits 99-101**.

16 77. On September 30, 2024, I visited the District of Massachusetts – CM/ECF
17 Official Court Electronic Filing System website. I downloaded a copy of the Settlement
18 Agreement, Dkt. 222-1, filed November 25, 2019, and Defendants’ Status Statement, Dkt.
19 381, filed June 10, 2024, in *Briggs, et al. v. Massachusetts Department of Corrections, et*
20 *al.*, Case No. 15-cv-40162-RGS (D. Mass.). True and correct copies of these documents are
21 attached as **Exhibits 102-103**.

22 78. On September 30, 2024, I visited the Eastern District of Michigan –
23 CM/ECF Official Court Electronic Filing System website. I downloaded a copy of the
24 Proposed Settlement Agreement, Dkt. 118-2, filed March 14, 2019, and Order Granting the
25 Parties’ Joint Motion for Final Approval of Class Action Settlement, Dkt. 120, filed March
26 29, 2019, in *McBride v. Michigan Department of Corrections*, Case No. 15-cv-11222-
27 SFC-DRG (E.D. Mich.). True and correct copies of these documents are attached as
28 **Exhibits 104-105**.

1 79. On September 30, 2024, I visited
2 [https://www.michigan.gov/corrections/public-information/statistics-and-reports/policy-](https://www.michigan.gov/corrections/public-information/statistics-and-reports/policy-directives)
3 [directives](https://www.michigan.gov/corrections/public-information/statistics-and-reports/policy-directives) , an official webpage of the Michigan Department of Corrections, entitled
4 “Policy Directives.” From this webpage, I downloaded the Michigan Department of
5 Corrections’s “Policy Directive Regarding Deaf and/or Hard of Hearing Prisoners,” which
6 lists an effective date of May 1, 2021, from the following link:
7 [https://www.michigan.gov/corrections/-/media/Project/Websites/corrections/Files/Policy-](https://www.michigan.gov/corrections/-/media/Project/Websites/corrections/Files/Policy-Directives/PDs-04-Institutional-Operations/PD-0406-Medical-and-Mental-Health-Services/04-06-156-Deaf-and-or-Hard-of-Hearing-Prisoners-effective-05-01-21.pdf?rev=80225a0538f745f889753ad13d3f134b)
8 [Directives/PDs-04-Institutional-Operations/PD-0406-Medical-and-Mental-Health-](https://www.michigan.gov/corrections/-/media/Project/Websites/corrections/Files/Policy-Directives/PDs-04-Institutional-Operations/PD-0406-Medical-and-Mental-Health-Services/04-06-156-Deaf-and-or-Hard-of-Hearing-Prisoners-effective-05-01-21.pdf?rev=80225a0538f745f889753ad13d3f134b)
9 [Services/04-06-156-Deaf-and-or-Hard-of-Hearing-Prisoners-effective-05-01-](https://www.michigan.gov/corrections/-/media/Project/Websites/corrections/Files/Policy-Directives/PDs-04-Institutional-Operations/PD-0406-Medical-and-Mental-Health-Services/04-06-156-Deaf-and-or-Hard-of-Hearing-Prisoners-effective-05-01-21.pdf?rev=80225a0538f745f889753ad13d3f134b)
10 [21.pdf?rev=80225a0538f745f889753ad13d3f134b](https://www.michigan.gov/corrections/-/media/Project/Websites/corrections/Files/Policy-Directives/PDs-04-Institutional-Operations/PD-0406-Medical-and-Mental-Health-Services/04-06-156-Deaf-and-or-Hard-of-Hearing-Prisoners-effective-05-01-21.pdf?rev=80225a0538f745f889753ad13d3f134b). A true and correct copy of the policy is
11 attached as **Exhibit 106**.

12 80. On September 30, 2024, I visited <https://outside.vermont.gov/dept/DOC>, an
13 official website of the State of Vermont Department of Corrections that lists “DOC Policy
14 Documents.” From this page, I downloaded the publicly-available policy issued by the
15 State of Vermont, Agency of Human Services, Department of Corrections, entitled
16 “Effective Communication for Deaf and Hearing Impaired,” which has an effective date of
17 January 26, 2022, from the following link:
18 [https://outside.vermont.gov/dept/DOC/Policies/Effective%20Communication%20for%20](https://outside.vermont.gov/dept/DOC/Policies/Effective%20Communication%20for%20Deaf%20and%20Hearing%20Impaired%20Policy.pdf)
19 [Deaf%20and%20Hearing%20Impaired%20Policy.pdf](https://outside.vermont.gov/dept/DOC/Policies/Effective%20Communication%20for%20Deaf%20and%20Hearing%20Impaired%20Policy.pdf). A true and correct copy of the
20 policy is attached as **Exhibit 107**.

21 81. On September 30, 2024, I visited <https://www.washlaw.org>, an official
22 website of the Washington Lawyers’ Committee for Civil Rights and Urban Affairs. I
23 clicked on the “Search” icon, which brought me to the “Search” page. I typed “Jarboe”
24 into the search box, and clicked on the first and only result on the results page: a press
25 release entitled, “Landmark Settlements Reached in Maryland and Kentucky for Deaf
26 Prisoners.” From this press release, I downloaded the publicly-available Settlement
27 Agreement in *Jarboe v. Maryland Department of Public Safety and Correctional Services*
28 from the following link: <https://www.washlaw.org/deaf-inmates-md-ky-settlement/>. A true

1 and correct copy of the *Jarboe* Settlement Agreement is attached as **Exhibit 158**.

2 82. On October 9, 2024, I visited <https://www.justice.gov/crt>, an official website
3 of the U.S. Department of Justice (DOJ) Civil Rights Division. I clicked on “Cases and
4 Matters” on the navigation menu. I then clicked “Cases” under the “Disability”
5 subheading. I selected “Wisconsin Department of Corrections” from the list of “Disability
6 Rights Cases.” From the “Wisconsin Department of Corrections” page, I downloaded the
7 publicly-available Settlement Agreement between the U.S. and the Wisconsin Department
8 of Corrections (DJ # 204-85-131) from the following link:
9 <https://www.justice.gov/crt/media/1371371/dl>. A true and correct copy of the Settlement
10 Agreement is attached as **Exhibit 159**.

11 83. On June 24, 2024, my colleagues Rita Lomio, Skye Lovett, and I met with
12 attorneys for CDCR, CDCR officials, and the Court Expert regarding effective
13 communication of announcements. At that meeting, attorneys for CDCR told us that Dr.
14 Nathan Swett had been retained by CDCR in June 2024, had no prior correctional
15 experience, and had never been in a correctional setting before being retained by CDCR.

16 **Accessible Phones – Class Member Training (SATF Stipulation 9)**

17 84. As noted above, there are currently three people designated DPH at SATF.
18 All of these individuals are deaf signers, and so should be accommodated by a sign
19 language interpreter.

20 85. On December 21, 2023, Ron Broomfield, Division of Adult Institutions,
21 issued an amended memorandum titled, “Amended Issuance of iPads to Incarcerated
22 Persons with a Permanent Hearing Disability.” A true and correct copy of the
23 memorandum is attached as **Exhibit 108**.

24 86. On August 26, 2024, Jen McDonald-Peltier, an Assistive Technology (AT)
25 and Augmentative and Alternative Communication (AAC) Specialist, produced an expert
26 declaration regarding training related to accessible phones. A true and correct copy of
27 Ms. McDonald-Peltier’s expert declaration is attached as **Exhibit 109**.

28 87. On May 8, 2024, Rita Lomio, Prison Law Office, sent a letter to Tamiya

1 Davis, CDCR Office of Legal Affairs, regarding CART eligibility. A true and correct copy
2 of Ms. Lomio's letter (without exhibits) is attached as **Exhibit 110**.

3 88. On September 10, 2024, Ron Broomfield, Division of Adult Institutions,
4 responded to Ms. Lomio's May 8, 2024, letter regarding CART eligibility. A true and
5 correct copy of Mr. Broomfield's letter is attached as **Exhibit 111**.

6 89. On October 24, 2023, Rita Lomio, Prison Law Office, sent an email to
7 Ramon Ruiz, CDCR Office of Legal Affairs, regarding the SATF RAP's improper denial
8 of an 1824 request for CART and attached 1824 Log No. 23-01531. A true and correct
9 copy of Ms. Lomio's email and 1824 Log No. 23-01531 is attached as **Exhibit 112**.

10 90. On February 5, 2024, Bryan D. Phillips, Warden at SATF, responded to
11 Ms. Lomio's October 24, 2023, email regarding the denial of CART services in response
12 to 1824 Log No. 23-01531. A true and correct copy of Warden Phillips' response is
13 attached as **Exhibit 113**.

14 91. On November 21, 2023, Rita Lomio, Prison Law Office, sent an email to
15 Tamiya Davis and Ramon Ruiz, CDCR Office of Legal Affairs, regarding the SATF
16 RAP's improper denial of an 1824 request for CART and attached 1824 Log No. 23-
17 01511. A true and correct copy of Ms. Lomio's email and 1824 Log No. 23-01511 is
18 attached as **Exhibit 114**.

19 92. On February 8, 2024, Bryan D. Phillips, Warden at SATF, responded to
20 Ms. Lomio's November 21, 2023, email regarding the denial of CART services in
21 response to 1824 Log No. 23-01511. A true and correct copy of Warden Phillips' response
22 is attached as **Exhibit 115**.

23 93. On July 9, 2019, DPH class member A.S. attended a parole consideration
24 hearing in front of the Board of Parole Hearings. A true and correct copy of an excerpt
25 from the hearing transcript is attached as **Exhibit 116**.

26 **Accessible Phones – Staff Training (SATF Stipulation 10)**

27 94. A true and correct copy of the declaration of Tammatha Foss, Director of
28 Corrections Services at CCHCS, dated August 4, 2021, and filed in *Plata v. Newsom*, is

1 attached as **Exhibit 117**.

2 95. A true and correct copy of the declaration of Tammatha Foss, Director of
3 Corrections Services at CCHCS, dated September 10, 2021, and filed in *Plata v. Newsom*,
4 is attached as **Exhibit 118**.

5 96. On November 17, 2023, Bryan D. Phillips, Warden at SATF, and Anu
6 Banerjee, CEO of SATF, issued a memorandum titled, “Local Operating Procedure 403,
7 ‘Disability Placement Program’ Addendum.” A true and correct copy of the memorandum
8 is attached as **Exhibit 119**.

9 97. On December 7, 2023, counsel for Defendants produced a copy of an
10 addendum to Local Operating Procedure 0-0901 titled, “Addendum Operational Procedure
11 0-0901 Disability Placement Program-Telecommunication Devices October 6, 2023,” to
12 Plaintiffs’ counsel. A true and correct copy of the addendum is attached as **Exhibit 120**.

13 98. On July 2, 2024, Peggy Llamas, Acting Warden at SATF, issued a
14 memorandum titled, “Operating Procedure 112, Daily Activity Schedule.” A true and
15 correct copy of the memorandum is attached as **Exhibit 121**.

16 99. On April 18, 2024, counsel for Defendants produced a spreadsheet, titled
17 “Copy of Top 10 CCII Monthly Review November 2023 (002),” in response to a request
18 for documents related to Defendants’ self-monitoring at SATF sent by the Court Expert on
19 March 29, 2024. A true and correct copy of the SATF Top 10 CCII Monthly Review
20 November 2023 spreadsheet is attached as **Exhibit 122**.

21 100. On April 18, 2024, counsel for Defendants produced a spreadsheet, titled
22 “CSATF Top 10 CCII Monthly Review December 2023,” in response to a request for
23 documents related to Defendants’ self-monitoring at SATF sent by the Court Expert on
24 March 29, 2024. A true and correct copy of the SATF Top 10 CCII Monthly Review
25 December 2023 spreadsheet is attached as **Exhibit 123**.

26 101. On April 18, 2024, counsel for Defendants produced a spreadsheet, titled
27 “CSATF Top 10 CCII Monthly Review Jan 2024,” in response to a request for documents
28 related to Defendants’ self-monitoring at SATF sent by the Court Expert on March 29,

1 2024. A true and correct copy of the SATF Top 10 CCII Monthly Review January 2024
2 spreadsheet is attached as **Exhibit 124**.

3 102. [This paragraph intentionally left blank.]

4 103. [This paragraph intentionally left blank.]

5 104. [This paragraph intentionally left blank.]

6 105. [This paragraph intentionally left blank.]

7 **Captioned Phone Installation (SATF Stipulation 11)**

8 106. A CDCR Office of Legal Affairs Office Technician produced to Plaintiffs’
9 counsel the Institution Bed Audit on May 29, 2024. Per this audit document, SATF has 32
10 total housing units. A true and correct copy of the Institution Bed Audit is attached as
11 **Exhibit 129**.

12 107. Based on my review of the September 1, 2024, DPP Roster Report and based
13 on Defendants’ representation of which housing units at SATF have captioned phones, *see*
14 Lorey Decl., Ex. H at 1, I determined that as of September 1, 2024, 264 of the 403 people
15 at SATF designated DNH or DPH were housed in a unit other than one of the housing
16 units where Defendants elected to install a captioned phone.

17 **CART (SATF Stipulation 13)**

18 108. [This paragraph intentionally left blank.]

19 109. On July 22, 2024, Plaintiffs’ counsel sent counsel for Defendants and the
20 Court Expert a letter titled, “Plaintiffs’ Statement Regarding CART and ViewSonic.” A
21 true and correct copy of the position statement is attached as **Exhibit 131**.

22 110. A true and correct copy of the declaration of Etienne Harvey, a California-
23 certified Sign-Language Interpreter (SLI), dated July 17, 2024, is attached as **Exhibit 132**.

24 111. A true and correct copy of the declaration of Jen McDonald-Peltier, an
25 Assistive Technology and Augmentative and Alternative Communication Specialist, dated
26 July 21, 2024, is attached as **Exhibit 133**.

27 112. A true and correct copy of the declaration of Tremmel Watson, an American
28 Sign Language (ASL) instructor and formerly-incarcerated deaf class member, dated July

1 22, 2024, is attached as **Exhibit 134**.

2 113. On July 29, 2024 counsel for Defendants sent Plaintiffs' counsel and the
3 Court Expert a letter titled, "Defendants' Position Regarding Whiteboard Captioning
4 Technology." A true and correct copy of their position statement is attached as **Exhibit**
5 **135**.

6 114. On July 12, 2023, counsel for Defendants produced a copy of the Statement
7 of Work for CART services, signed May 15, 2023, between CDCR and Cal Interpreting &
8 Translations to Plaintiffs' counsel. A true and correct copy of the statement of work is
9 attached as **Exhibit 136**.

10 115. On October 27, 2023, counsel for Defendants produced a copy of the
11 statewide agreement between BPH and Natural Language LCC (Agreement Number
12 C5611397), signed June 20, 2023, for SLI services during parole hearings to Plaintiffs'
13 counsel. A true and correct copy of the agreement is attached as **Exhibit 137**.

14 **RVRs (SATF Stipulation 14)**

15 116. On July 18, 2024, counsel for Defendants produced CCHCS's proposed
16 policy memorandum, dated July 8, 2024, regarding healthcare staff's role in the RVR
17 process, titled "Limiting Licensed Health Care Staff Access to Rules Violation Reports."
18 True and correct copies of counsel for Defendants' email and CCHCS's memorandum are
19 attached as **Exhibit 138-139**.

20 117. On August 15, 2024, counsel for Defendants produced CCHCS's draft
21 training materials, titled "Licensed Health Care (HC) Staff Role in the Rule Violate Report
22 (RVR) Process." On August 22, 2024, my colleague Sophie Hart, Prison Law Office, sent
23 comments on these training materials to counsel for Defendants. True and correct copies
24 of Ms. Hart's email and attachments are attached as **Exhibits 140-142**.

25 118. On August 28, 2024, Audrey Barron, Swanson & McNamara LLP, emailed
26 the parties comments on CCHCS's draft training materials, titled "Licensed Health Care
27 (HC) Staff Role in the Rule Violate Report (RVR) Process." A true and correct copy of
28 Ms. Barron's email is attached as **Exhibit 143**.

1 119. On September 17, 2024, counsel for Defendants produced CCHCS’s revised
2 training materials, titled “Licensed Health Care (HC) Staff Role in the Rule Violate Report
3 (RVR) Process.” True and correct copies of counsel for Defendants’ email and attachment
4 are attached as **Exhibit 144**.

5 120. [This paragraph intentionally left blank.]

6 121. [This paragraph intentionally left blank.]

7 122. [This paragraph intentionally left blank.]

8 123. On October 8, 2024 my colleague Sophie Hart, Prison Law Office, sent an
9 email to counsel for Defendants titled “SATF Stipulation 14 and 125 Update.” A true and
10 correct copy of this email is attached hereto as **Exhibit 160**.

11 124. On October 10, 2024, counsel for Defendants responded to Ms. Hart’s email.
12 A true and correct copy of their email is attached hereto as **Exhibit 161**.

13 **7362 Process (SATF Stipulation 15)**

14 125. On June 5, 2023, my colleagues, Skye Lovett and Rita Lomio, sent a letter to
15 Dr. Joseph Bick and Joseph Williams, CCHCS, with the subject line, “Need for SATF
16 LOP and HCDOM Revisions to Ensure Timely Response to 7362 Requests for Durable
17 Medical Equipment Repair and Replacement.” A true and correct copy of their letter is
18 attached as **Exhibit 148**.

19 126. On August 9, 2023, CCHCS sent Plaintiffs’ counsel a response to our June 5,
20 2023 letter. A true and correct copy of the CCHCS response memorandum titled Timely
21 Response to 7362 Requests for Durable Medical Equipment Repair and Replacement is
22 attached as **Exhibit 149**.

23 127. On October 9, 2023, my colleague Sophie Hart, Prison Law Office, sent an
24 advocacy letter in *Plata* to CCHCS and the *Plata* Receiver's Office of Legal Affairs
25 regarding D.W. A true and correct copy of the *Plata* advocacy letter is attached as **Exhibit**
26 **150**.

27 128. On November 8, 2023, CCHCS sent Ms. Hart a response to her *Plata*
28 advocacy letter on behalf of D.W. A true and correct copy of the CCHCS memorandum is

1 attached as **Exhibit 151**.

2 129. On February 5, 2024, Sharon Garske, Office of the Attorney General, sent a
3 letter to Plaintiffs’ counsel and the Court Expert regarding SATF Stipulation No. 15. A
4 true and correct copy of Ms. Garske’s letter is attached as **Exhibit 152**.

5 130. On April 10, 2024, I sent a letter to Brianne Burkart, CCHCS Office of Legal
6 Affairs, regarding the accessibility of the new CCHCS systems for submitting CDCR
7 7362s electronically. A true and correct copy of my letter is attached as **Exhibit 153**.

8 131. On August 20, 2024, Plaintiffs’ counsel in *Plata* sent a memorandum
9 regarding a patient at SATF with limited use of his hands due to a history of third-degree
10 burns to CCHCS. A true and correct copy of this memorandum, dated August 20, 2024, is
11 attached as **Exhibit 154**. The memorandum references two sick-call slips (CDCR 7362s).
12 The memorandum states that the first CDCR 7362 was submitted on August 4, 2024, and
13 triaged on August 7, 2024, and notes “MA/LVN.” The CDCR 7362 reads, “Didn’t get my
14 Friday (8-2-24) wetwipes I need to get them ASAP.” A true and correct copy of the CDCR
15 7362, dated August 4, 2024, is attached as **Exhibit 155**. The memorandum also states that
16 the second CDCR 7362 was submitted on August 15, 2024, and triaged on August 19,
17 2024, and notes, “MA/CNA.” The CDCR 7362 reads, “I haven’t gotten my wetwipes in 2
18 weeks!!! I don’t have hands so those are what I use to wipe my butt with, this is very
19 unacceptable because I’ve to use my clothes to wipe, please fix this error and get me my
20 wipes ASAP!!!” A true and correct copy of the CDCR 7362, dated August 15, 2024, is
21 attached as **Exhibit 156**.

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132. On August 23, 2024, Sharon Garske, Office of the Attorney General, sent an email to Plaintiffs’ counsel and the Court Expert providing an update on SATF Stipulation No. 15 (CCHCS 7362 Process). A true and correct copy of Ms. Garske’s email is attached as **Exhibit 157**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. This declaration is executed at Brooklyn, New York this 16th day of October, 2024.

/s/ Jacob J. Hutt
Jacob J. Hutt

[4588881.1]

**INDEX OF EXHIBITS TO DECLARATION OF JACOB J. HUTT IN SUPPORT
OF JOINT STATUS STATEMENT REGARDING COMPLIANCE WITH THE
COURT'S DECEMBER 7, 2023 ORDER**

Exhibit	Description	
1	Declaration of S.C., DNH class member at SATF (August 6, 2024)	REDACTED & UNDER SEAL
2	Declaration of J.K., DNH class member at SATF (August 6, 2024)	REDACTED & UNDER SEAL
3	Declaration of L.B., DNH class member at SATF (August 6, 2024)	REDACTED & UNDER SEAL
4	Declaration of M.M., DNH class member at SATF (August 6, 2024)	REDACTED & UNDER SEAL
5	Declaration of H.C., DNH class member at SATF (August 6, 2024)	REDACTED & UNDER SEAL
6	Declaration of C.M., DNH class member at SATF (August 15, 2024)	REDACTED & UNDER SEAL
7	Declaration of S.B., DNH class member at SATF (August 15, 2024)	REDACTED & UNDER SEAL
8	Declaration of R.W., DPH class member at SQ (August 20, 2024)	REDACTED & UNDER SEAL
9	Declaration of G.E., DNH class member at SATF (September 17, 2024)	REDACTED & UNDER SEAL
10	Declaration of Z.H., DPH class member at SATF (September 17, 2024)	REDACTED & UNDER SEAL
11	Declaration of S.R., DPH class member at SATF (September 17, 2024)	REDACTED & UNDER SEAL

Exhibit	Description	
12	Declaration of C.M., DNH class member at SATF (September 17, 2024)	REDACTED & UNDER SEAL
13	Declaration of S.M., DNH class member at SATF (September 17, 2024)	REDACTED & UNDER SEAL
14	Declaration of C.Q., DPH class member at RJD (September 18, 2024)	REDACTED & UNDER SEAL
15	Declaration of H.C., DPH class member at RJD (September 18, 2024)	REDACTED & UNDER SEAL
16	Declaration of A.C., DPH class member at SQ (September 25, 2024)	REDACTED & UNDER SEAL
17	Declaration of J.S., DNH class member at MCSP (October 9, 2024)	REDACTED & UNDER SEAL
18	CDCR 1824 Log No. 522096 submitted by S.B., DNH, SATF (February 19, 2024) and RAP Response (March 19, 2024)	REDACTED & UNDER SEAL
19	CDCR 1824 Log No. 534889 submitted by S.B., DNH, SATF (March 17, 2024) and RAP Response (April 10, 2024)	REDACTED & UNDER SEAL
20	CDCR 1824 Log No. 539828 submitted by S.B., DNH, SATF (March 26, 2024) and RAP Response (April 18, 2024)	REDACTED & UNDER SEAL
21	CDCR 1824 Log No. 530605 submitted by L.B., DNH, SATF (March 6, 2024) and Amended RAP Response (April 26, 2024)	REDACTED & UNDER SEAL

Exhibit	Description	
22	CDCR 1824 Log No. SATF-D-21-01598 submitted by L.B., DNH, SATF (October 5, 2021) and RAP Response (November 2, 2021)	REDACTED & UNDER SEAL
23	CDCR 1824 Log No. 498625 submitted by L.B., DNH, SATF (received on December 29, 2023) and RAP Response (January 25, 2024)	REDACTED & UNDER SEAL
24	CDCR 1824 Log No. 590923 submitted by L.B., DNH, SATF (July 10, 2024) and RAP Response (August 9, 2024)	REDACTED & UNDER SEAL
25	CDCR 1824 Log No. 590237 submitted by S.C., DNH, SATF (July 9, 2024) and RAP response (August 7, 2024)	REDACTED & UNDER SEAL
26	CDCR 1824 Log No. 524844 submitted by S.C., DNH, SATF (February 23, 2024) and RAP Response (March 22, 2024)	REDACTED & UNDER SEAL
27	CDCR 1824 Log No. 499490 submitted by S.C., DNH, SATF (December 29, 2023) and RAP Response (January 30, 2024)	REDACTED & UNDER SEAL
28	CDCR 1824 Log No. SATF-A-23-00491 submitted by S.C., DNH, SATF (March 2, 2023) and RAP Response (March 28, 2023)	REDACTED & UNDER SEAL
29	CDCR 1824 Log No. 490926 submitted by J.K., DNH, SATF (December 8, 2023) and RAP Response (January 10, 2024)	REDACTED & UNDER SEAL
30	CDCR 1824 Log No. 543876 submitted by C.M., DNH, SATF (April 3, 2024) and RAP Response (April 24, 2024)	REDACTED & UNDER SEAL

Exhibit	Description	
31	CDCR 1824 Log No. 603586 submitted by C.M., DNH, SATF (August 3, 2024) and RAP Response (September 3, 2024)	REDACTED & UNDER SEAL
32	CDCR 1824 Log No. 590266 submitted by M.M., DNH, SATF (July 9, 2024) and RAP Response (August 9, 2024)	REDACTED & UNDER SEAL
33	CDCR 1824 Log No. 511002 submitted by R.W., DPH, SQ (January 24, 2024) and RAP Response (February 23, 2024)	REDACTED & UNDER SEAL
34	CDCR 1824 Log No. 520917 submitted by D.T., DNH, SATF (February 14, 2024) and RAP Response (March 12, 2024)	REDACTED & UNDER SEAL
35	CDCR 1824 Log No. 500990 submitted by D.T., DNH, SATF (January 3, 2024) and RAP Response (February 1, 2024)	REDACTED & UNDER SEAL
36	CDCR 1824 Log No. 520316 submitted by G.N., DNH, SATF (January 31, 2024) and RAP response (March 12, 2024)	REDACTED & UNDER SEAL
37	CDCR 1824 Log No. 492884 submitted by L.J., DPO, SATF (December 12, 2023) and RAP Response (January 12, 2024)	REDACTED & UNDER SEAL
38	CDCR 1824 Log No. 493631 submitted by L.J., DPO, SATF (December 17, 2023) and RAP Response (January 17, 2024)	REDACTED & UNDER SEAL
39	CDCR 1824 Log No. 457562 submitted by R.A., DPO, SATF (October 1, 2023) and RAP Response (undated)	REDACTED & UNDER SEAL

Exhibit	Description	
40	CDCR 1824 Log No. 469166 submitted by D.E., SATF (October 24, 2023) and RAP Response (November 21, 2023)	REDACTED & UNDER SEAL
41	CDCR 1824 Log No. 490965 submitted by R.B., DNH, SATF (December 10, 2023) and RAP Response (January 9, 2024)	REDACTED & UNDER SEAL
42	CDCR 1824 Log No. 592614 submitted by M.B., DNH, SATF (July 12, 2024) and RAP Response (August 13, 2024)	REDACTED & UNDER SEAL
43	CDCR 1824 Log No. 508719 submitted by J.F., DNH, SATF (January 20, 2024) and RAP Response (February 21, 2024)	REDACTED & UNDER SEAL
44	CDCR 1824 Log No. 528488 submitted by R.L., DNH, SATF (March 4, 2024) and RAP Response (March 28, 2024)	REDACTED & UNDER SEAL
45	CDCR 1824 Log No. 523321 submitted by E.E., DNH, SATF (February 21, 2024) and RAP Response (March 20, 2024)	REDACTED & UNDER SEAL
46	CDCR 1824 Log No. 520909 submitted by T.K., DNH, SATF (February 3, 2024) and RAP Response (March 13, 2024)	REDACTED & UNDER SEAL
47	CDCR 1824 Log No. 460315 submitted by T.K., DNH, SATF (October 5, 2023) and RAP Response (November 3, 2023)	REDACTED & UNDER SEAL
48	CDCR 1824 Log No. 517620 submitted by H.C., DNH, SATF (February 7, 2024) and RAP Response (March 7, 2024)	REDACTED & UNDER SEAL

Exhibit	Description	
49	CDCR 1824 Log No. 505659 submitted by S.S., DNH, SATF (January 13, 2024) and RAP Response (February 15, 2024)	REDACTED & UNDER SEAL
50	CDCR 1824 Log No. 505665 submitted by J.A.S., DNH, SATF (January 13, 2024) and RAP Response (February 15, 2024)	REDACTED & UNDER SEAL
51	CDCR 1824 Log No. 503894 submitted by J.S., DNH, MCSP (January 9, 2024) and RAP Response (February 9, 2024)	REDACTED & UNDER SEAL
52	CDCR 1824 Log No. 502652 submitted by C.H., DNH, SATF (December 6, 2023) and RAP Response (February 7, 2024)	REDACTED & UNDER SEAL
53	CDCR 1824 Log No. 499284 submitted by S.F., DNH, SATF (December 29, 2023) and RAP Response (January 31, 2024)	REDACTED & UNDER SEAL
54	CDCR 1824 Log No. 491830 submitted by V.P., DNH, SATF (December 11, 2023) and RAP Response (January 12, 2024)	REDACTED & UNDER SEAL
55	CDCR 1824 Log No. 490909 submitted by A.G., DNH, SATF (December 8, 2023) and RAP Response (January 9, 2024)	REDACTED & UNDER SEAL
56	CDCR 1824 Log No. 490979 submitted by E.P., DNH, SATF (December 8, 2023) and RAP Response (January 9, 2024)	REDACTED & UNDER SEAL
57	CDCR 1824 Log No. 490984 submitted by B.D., DNH, SATF (December 8, 2023) and RAP Response (January 9, 2024)	REDACTED & UNDER SEAL

Exhibit	Description	
58	CDCR 1824 Log No. 490952 submitted by D.C., DNH, SATF (December 10, 2023) and RAP Response (January 9, 2024)	REDACTED & UNDER SEAL
59	CDCR 1824 Log No. 490970 submitted by R.Z.W., DNH, SATF (December 8, 2023) and RAP Response (January 9, 2024)	REDACTED & UNDER SEAL
60	CDCR 1824 Log No. 490976 submitted by R.W.W., DNH, SATF (December 8, 2023) and RAP Response (January 9, 2024)	REDACTED & UNDER SEAL
61	CDCR 1824 Log No. 490660 submitted by W.L., DNH, SATF (December 9, 2023) and RAP Response (January 9, 2024)	REDACTED & UNDER SEAL
62	CDCR 1824 Log No. 471979 submitted by R.M., DNH, SATF (October 30, 2023) and RAP Response (November 29, 2023)	REDACTED & UNDER SEAL
63	(Intentionally left blank)	
64	(Intentionally left blank)	
65	(Intentionally left blank)	
66	(Intentionally left blank)	
67	(Intentionally left blank)	
68	(Intentionally left blank)	
69	Email from Tania Amarillas, Prison Law Office, to Defendants Regarding Blind and Low Vision Individualized Vision Assessments List (August 5, 2024)	REDACTED & UNDER SEAL

Exhibit	Description	
70	Advocacy Letter from Tania Amarillas and Rita Lomio, Prison Law Office, to Defendants regarding Individualized Vision Assessments at SATF (August 7, 2024)	REDACTED & UNDER SEAL
71	Email from Staff Services Analyst, Office of Legal Affairs, to Prison Law Office regarding Blind and Low Vision Individualized Vision Assessments List (August 8, 2024)	
72	Email from Sharon Garske, Office of the Attorney General, to Plaintiffs and Court Expert regarding SATF Stipulation No. 5 (Individualized Vision Assessments) (September 20, 2024)	REDACTED & UNDER SEAL
73	Memorandum from California Correctional Health Care Services to Prison Law Office regarding SATF Special Review (August 15, 2024)	
74	SATF Local Operating Procedure 403, "Disability Placement Program" (June 19, 2023)	
75	SATF Local Operating Procedure 526, "Statewide Kiosk and Tablet Program" (June 8, 2022) and Addendum (August 22, 2022)	
76	Dr. Andrea Bourne's Expert Report Regarding Effective Communication of Announcements for Deaf and Hard-of-Hearing Incarcerated People (July 26, 2024)	REDACTED & UNDER SEAL
77	Dr. Andrea Bourne's Expert Supplemental Expert Report Regarding Effective Communication of Announcements for Deaf and Hard-of-Hearing Incarcerated People (August 26, 2024)	REDACTED & UNDER SEAL

Exhibit	Description	
78	Advocacy Letter from Rita Lomio, Prison Law Office, to Defendants Regarding L.B.'s Assistive Technology Request (April 10, 2024)	REDACTED & UNDER SEAL
79	Email from Rita Lomio, Prison Law Office, to Tamiya Davis, CDCR Office of Legal Affairs, regarding April 10, 2024 Advocacy Letter for L.B. (July 26, 2024)	REDACTED & UNDER SEAL
80	Emails between Brianne Burkart, CCHCS Office of Legal Affairs, and Marissa Hatton, Prison Law Office, regarding Follow-up Questions Regarding Hearing Aids (April 19, 2024)	
81	Letter from Jacob Hutt and Skye Lovett, Prison Law Office, to Defendants regarding Plaintiffs' Written Feedback on Draft Proposal Regarding Effective Communication of Announcements (SATF Stipulation Item 7) (March 20, 2024)	REDACTED & UNDER SEAL
82	Letter from Jacob Hutt and Skye Lovett, Prison Law Office, to Defendants regarding Plaintiffs' Summary of Disagreements Regarding SATF Stipulation Item 7 (May 31, 2024)	
83	Letter from Anne M. Kammer, Office of the Attorney General, to Jacob Hutt, Prison Law Office, and Ed Swanson, Court Expert, Regarding Defendants' Response to Plaintiffs' May 31, 2024 Letter Regarding SATF Stipulation Item No. 7 (July 3, 2024)	

Exhibit	Description	
84	Letter from Anne M. Kammer, Office of the Attorney General, to Jacob Hutt, Prison Law Office Regarding Defendants' Response to Plaintiffs' July 10, 2024 Email Regarding SATF Stipulation Item No. 7 (July 18, 2024)	
85	Emails between Sharon Garske, Office of the Attorney General, and Rita Lomio, Prison Law Office, regarding SATF Stipulation Status Statement (August 7, 2024)	
86	Letter from Bryan Phillips, Warden, and Dr. Anu Banerjee, CEO, to Rita Lomio, Prison Law Office, regarding Plaintiffs' Summary of SATF Monitoring Tour Findings (February 20, 2024)	REDACTED & UNDER SEAL
87	MP4 file entitled, "Incorrect Way to Handle the Situation"	
88	MP4 file entitled, "How the Situation Should Have Been Handled"	
89	Email from Tovah Ackerman, Prison Law Office, to Ramon Ruiz, CDCR Office of Legal Affairs, regarding Staff Training Videos on Effective Communication of Announcements (November 29, 2023)	
90	Email from Tamiya Davis, CDCR Office of Legal Affairs, to All Parties regarding Staff Training Videos on Effective Communication of Announcements (March 25, 2024)	

Exhibit	Description	
91	Letter from Rita Lomio, Prison Law Office, to Sharon Garske, Office of the Attorney General, regarding Improper Denials of Speech-to-Text Accommodations at SATF (September 19, 2024)	REDACTED & UNDER SEAL
92	Email from Sharon Garske, Office of the Attorney General, to Plaintiffs and Court Expert regarding Tablets (August 28, 2024)	
93	Letter from Skye Lovett and Rita Lomio, Prison Law Office, to Tamiya Davis, CDCR Office of Legal Affairs, regarding Systematic Denials of Vibrating Watches to DNH Class Members at SATF (September 27, 2024)	REDACTED & UNDER SEAL
94	Minnesota Department of Corrections, ADA Paging Guidelines Attachment to Policy No. 203.250 (June 4, 2024)	
95	<i>Disability Law Colorado v. Colorado Department of Corrections</i> , Dkt. 74 Order Approving Joint Motion to Dismiss and Request to Retain Jurisdiction to Enforce Settlement Agreement (August 15, 2022)	
96	<i>Ralph Holmes, et al. v. Rob Jeffreys, et al.</i> , Dkt. 743 Defendant's Status Report to the Court (April 22, 2022)	
97	<i>Ralph Holmes, et al. v. John Baldwin, et al.</i> , Dkt. 446-2 Stipulation of Settlement (July 12, 2018)	
98	<i>Ralph Holmes, et al. v. John Baldwin, et al.</i> , Dkt. 454 Order Granting Final Approval to Class Settlement and Overruling Objections (July 26, 2018)	

Exhibit	Description	
99	<i>Adams & Knights v. Kentucky Department of Corrections</i> , Dkt. 81-1 Settlement Agreement (June 24, 2015)	
100	<i>Adams & Knights v. Kentucky Department of Corrections</i> , Dkt. 81 Consent Judgment (June 24, 2015)	
101	<i>Adams & Knights v. Kentucky Department of Corrections</i> , Dkt. 99 Ninth Semi-Annual Report by the Settlement Monitor (December 16, 2020)	
102	<i>Briggs, et al. v. Massachusetts Department of Corrections, et al.</i> , Dkt. 222-1 Settlement Agreement (November 25, 2019)	
103	<i>Briggs, et al. v. Massachusetts Department of Corrections, et al.</i> , Dkt. 381 Defendants' Status Report (June 10, 2024)	
104	<i>McBride v. Michigan Department of Corrections</i> , Dkt. 118-2 [Proposed] Settlement Agreement (March 14, 2019)	
105	<i>McBride v. Michigan Department of Corrections</i> , Dkt. 120 Order Granting the Parties' Joint Motion for Final Approval of Class Action Settlement (March 29, 2019)	
106	Michigan Department of Corrections, Policy Directive No. 04.06.156, "Deaf and/or Hard of Hearing Prisoners" (May 1, 2021)	
107	Vermont Department of Corrections, Policy No. 316, "Effective Communication for Deaf and Hearing Impaired" (January 26, 2022)	

Exhibit	Description	
108	CDCR Memorandum from Ron Broomfield, Division of Adult Institutions, regarding Amended Issuance of iPads to Incarcerated Persons with a Permanent Hearing Disability (December 21, 2023)	
109	Jen McDonald-Peltier's Expert Declaration Regarding Assistive Technology Training (August 26, 2024)	REDACTED & UNDER SEAL
110	Advocacy Letter from Rita Lomio, Prison Law Office, to Defendants Regarding CART Eligibility (without exhibits) (May 8, 2024)	REDACTED & UNDER SEAL
111	CDCR Response to Rita Lomio, Prison Law Office, regarding CART Eligibility (September 10, 2024)	
112	Email from Rita Lomio, Prison Law Office, to Ramon Ruiz, CDCR Office of Legal Affairs, regarding SATF RAP's Improper Denial of 1824 Request for CART (October 24, 2023)	REDACTED & UNDER SEAL
113	CDCR Response to Rita Lomio, Prison Law Office, regarding SATF RAP's Improper Denial of 1824 Request for CART (February 5, 2024)	REDACTED & UNDER SEAL
114	Email from Rita Lomio, Prison Law Office, to Tamiya Davis and Ramon Ruiz, CDCR Office of Legal Affairs, regarding SATF RAP's Improper Denial of 1824 Request for CART (November 21, 2023)	REDACTED & UNDER SEAL
115	CDCR Response to Rita Lomio, Prison Law Office, regarding SATF RAP's Improper Denial of 1824 Request for CART (February 8, 2024)	REDACTED & UNDER SEAL

Exhibit	Description	
116	Board of Parole Hearing Transcript for A.S. (excerpt) (July 9, 2019)	
117	Declaration of Tammatha Foss (August 4, 2021)	
118	Declaration of Tammatha Foss (September 10, 2021)	
119	SATF Local Operating Procedure 403, "Disability Placement Program" Addendum (November 17, 2023)	
120	SQ Local Operating Procedure 0-0901-1, "Disability Placement Program" Addendum (October 6, 2023)	
121	SATF Local Operating Procedure 112, "Daily Activity Schedule" (July 2, 2024)	REDACTED & UNDER SEAL
122	SATF Top 10 CCII Monthly Review November 2023	REDACTED & UNDER SEAL
123	SATF Top 10 CCII Monthly Review December 2023	
124	SATF Top 10 CCII Monthly Review January 2024	REDACTED & UNDER SEAL
125	(Intentionally left blank)	
126	(Intentionally left blank)	
127	(Intentionally left blank)	
128	(Intentionally left blank)	
129	Institution Bed Audit 05-29-2024, produced by Defendants on May 29, 2024	

Exhibit	Description	
130	(Intentionally left blank)	
131	Plaintiffs' Position Statement Regarding CART and ViewSonic (July 22, 2024)	
132	Declaration of Etienne Harvey (July 17, 2024)	
133	Declaration of Jenn McDonald-Peltier (July 21, 2024)	
134	Declaration of Tremmel Watson (July 22, 2024)	
135	Defendants' Position Statement Regarding Whiteboard Captioning Technology (July 29, 2024)	
136	Statement of Work and Rate Sheet Between CDCR and Cal Interpreting & Translations for CART Services (May 15, 2023)	
137	Statewide Agreement Between CDCR/BPH and Natural Language LCC for SLI Services (June 20, 2023)	
138	Email from Sharon Garske, Office of the Attorney General, to Sophie Hart, Prison Law Office, regarding SATF Stipulation 14 and 15 Update (July 18, 2024)	
139	California Correctional Health Care Services Memorandum regarding Limiting Licensed Health Care Staff Access to Rules Violation Reports (July 8, 2024)	
140	Email from Sophie Hart, Prison Law Office, to Sharon Garske regarding SATF Stipulation 14 and 15 Update (August 22, 2024)	

Exhibit	Description	
141	Plaintiffs' Comments on the Health Care Rule Violation Report (RVR) Training PowerPoint (August 22, 2024)	
142	Plaintiffs' Comments on the Health Care Rules Violation Report (RVR) Training (August 22, 2024)	
143	Email from Audrey Barron, Court Expert, to Parties regarding SATF 14 (RVR policy) & 15 (7362 process) Update	
144	Licensed Health Care (HC) Staff Role in the Rule Violate Report (RVR) Process Training Materials (September 17, 2024)	
145	(Intentionally left blank)	
146	(Intentionally left blank)	
147	(Intentionally left blank)	
148	Letter from Skye Lovett and Rita Lomio, Prison Law Office, to Dr. Joseph Bick and Joseph Williams, California Correctional Health Care Services, regarding the Need for SATF LOP and HCDOM Revisions to Ensure Timely Response to 7362 Requests for Durable Medical Equipment Repair and Replacement (June 5, 2023)	REDACTED & UNDER SEAL
149	California Correctional Health Care Services Memorandum to Rita Lomio, Prison Law Office, regarding Timely Response to 7362 Requests for Durable Medical Equipment Repair and Replacement (August 9, 2023)	REDACTED & UNDER SEAL

Exhibit	Description	
150	<i>Plata</i> Advocacy Letter from Sophie Hart, Prison Law Office, to California Correctional Health Care Services and <i>Plata</i> Receiver's Office of Legal Affairs regarding D.W. (October 9, 2023)	REDACTED & UNDER SEAL
151	California Correctional Health Care Services Response to Sophie Hart, Prison Law Office, regarding <i>Plata</i> Advocacy Letter for D.W. (November 8, 2023)	REDACTED & UNDER SEAL
152	Letter from Sharon Garske, Office of the Attorney General, to Plaintiffs and Court Expert regarding SATF Stipulation No. 15 (February 5, 2024)	
153	Letter from Jacob Hutt, Prison Law Office, to Brianne Burkart, CCHCS Office of Legal Affairs, regarding Accessibility of New CCHCS Systems for Submitting 7362s Electronically (April 10, 2024)	
154	<i>Plata</i> Advocacy Letter from Rana Anabtawi, Prison Law Office, to California Correctional Health Care Services and <i>Plata</i> Receiver's Office of Legal Affairs regarding S.M. (August 20, 2024)	REDACTED & UNDER SEAL
155	CDCR Form 7362 submitted by S.M. regarding wet wipes (August 4, 2024)	REDACTED & UNDER SEAL
156	CDCR Form 7362 submitted by S.M. regarding wet wipes (August 15, 2024)	REDACTED & UNDER SEAL
157	Email from Sharon Garske, Office of the Attorney General, to Plaintiffs and Court Expert regarding SATF Stipulation No. 15 (CCHCS 7362 Process) Update (August 23, 2024)	

Exhibit	Description	
158	<i>Jarboe v. Maryland Department of Public Safety and Correctional Services, et al.</i> , Settlement Agreement	
159	Settlement Agreement between U.S. Department of Justice and Wisconsin Department of Corrections (DJ # 204-85-131)	
160	Email from Sophie Hart, Prison Law Office, to Sharon Garske, Office of the Attorney General, regarding SATF Stipulation 14 and 15 Update (October 8, 2024)	
161	Email from Sharon Garske, Office of the Attorney General, to Sophie Hart, Prison Law Office, regarding SATF Stipulation 14 and 15 Update (October 10, 2024)	