

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THOMAS REMICK, NADIYAH WALKER,	:	
JAY DIAZ, MICHAEL ALEJANDRO,	:	No. 2:20-cv-01959-BMS
MICHAEL DANTZLER, ROBERT	:	
HINTON, JOSEPH WEISS, JOSEPH	:	
SKINNER, SADDAM ABDULLAH, and	:	
JAMES BETHEA, on behalf of themselves	:	Judge Berle M. Schiller
and all others similarly situated,	:	
	:	
Plaintiffs-Petitioners,	:	
	:	
v.	:	
	:	
CITY OF PHILADELPHIA; and BLANCHE	:	
CARNEY, in her official capacity as	:	
Commissioner of Prisons,	:	
	:	
Defendants-Respondents.	:	

PLAINTIFFS’ STATUS REPORT

Plaintiffs file this status report to inform the Court of the current relevant conditions of confinement at the Philadelphia Department of Prisons (PDP) facilities. Plaintiffs submit this in preparation for the telephonic conference before the Court scheduled for November 10, 2021.

The data provided by the PDP and information provided by incarcerated persons and others, including criminal defense lawyers, show deeply troubling conditions of confinement. Serious staffing shortages, which have been conceded by the PDP and documented in the Deputy Warden reports, cause systemic lack of court-ordered daily out-of-cell time, distribution of medications, legal mail, basic hygiene supplies, and access to the law library. *See* Exhibit A (Declarations of plaintiff class members). People housed on a variety of units across all PDP facilities report a persistent lack of out-of-cell time, with some on segregation units going days at a time without coming out of their cells even to shower. *See* Williams Decl. ¶¶ 2-3; Scott Decl. ¶¶ 3-5; Flynn Decl. ¶¶ 9-12, 14, 16; Rue Decl. ¶¶ 3-7; Henry Decl. ¶¶ 14-17; Brookins Decl. ¶¶

8-9; Randolph Decl. ¶¶ 14-16, 22-23; Watkins Decl. ¶¶ 16-18; Berry Decl. ¶ 3; Duprey Decl. ¶¶ 3-6; Braxton Decl. ¶ 13; Tolbert Decl. ¶ 3; Copper Decl. ¶ 3; Robinson Decl. ¶ 3; Forth Decl. ¶¶ 3-4; Washington Decl. ¶ 3; Corker Decl. ¶¶ 3-4. Troublingly, people also report breakdowns in the provision of medical care and medications. *See* Williams Decl. ¶¶ 7-10, 11, 12; Scott Decl. ¶ 15; Flynn Decl. ¶¶ 3-6; Rue Decl. ¶ 8; Henry Decl. ¶¶ 18-19; Brookins Decl. ¶ 18; Watkins Decl. ¶ 15; Gupton Decl. ¶¶ 3-5, 7-12; Berry Decl. ¶¶ 6-8; Duprey Decl. ¶¶ 9-10, 14; Braxton Decl. ¶¶ 11, 12; Robinson Decl. ¶ 14; Forth Decl. ¶¶ 6-9, 11, 17-18, 23, 25; Washington Decl. ¶ 7; Corker Decl. ¶ 10.

Many people in PDP report living without access to basic cleaning, laundry, and hygiene supplies, including clean face masks to prevent against the spread of COVID-19. *See* Williams Decl. ¶¶ 14-17, 19; Scott Decl. ¶¶ 17-19; Rue Decl. ¶¶ 10-14; Henry Decl. ¶¶ 28-21; Brookins Decl. ¶¶ 11-12, 24, 27; Randolph Decl. ¶¶ 19-21, 27-28; Watkins Decl. ¶¶ 23-26; Gupton Decl. ¶¶ 13-15, 17; Berry Decl. ¶ 17; Duprey Decl. ¶¶ 19, 21; Braxton Decl. ¶¶ 17, 19-22; Tolbert Decl. ¶ 11; Copper Decl. ¶ 6; Robinson Decl. ¶¶ 5, 7-8; Forth Decl. ¶¶ 12, 22; Washington Decl. ¶ 8; Corker Decl. ¶¶ 6, 8. Some even describe persistent vermin and insect infestations. Brookins Decl. ¶¶ 22-24; Randolph Decl. ¶¶ 17-18; Watkins Decl. ¶ 27; Braxton Decl. ¶¶ 4-5; Copper Decl. ¶ 4; Washington Decl. ¶ 10; Corker Decl. ¶ 5.

People are very concerned about their access to their attorneys and other legal resources. There have been numerous complaints regarding delays in receiving and sending legal mail. *See* Williams Decl. ¶ 21; Scott Decl. ¶ 16; Flynn Decl. ¶ 19; Rue Decl. 16; Brookins Decl. ¶¶ 19-20; Gupton Decl. ¶ 25.

Additionally, many people are still reporting a lack of access to the law library. *See* Williams Decl. ¶ 22; Rue Decl. ¶ 15; Henry Decl. ¶ 34; Watkins Decl. ¶ 28; Gupton Decl. ¶ 26; Duprey Decl. ¶ 24; Copper Decl. ¶ 7; Robinson Decl. ¶ 12; Washington Decl. ¶ 5.

Furthermore, a large number of incarcerated people are also not being transported to court proceedings in criminal cases, despite testing negative for COVID-19, and, in some instances, being fully vaccinated. A quarantine period for a particular housing unit can last for weeks, causing those on quarantine to miss previously scheduled court dates and to face other restrictions. PDP has modified its policies for those on quarantine who continue to test negative for COVID-19, but as reported to Plaintiffs' counsel, the Sheriff's Department and the First Judicial District each continue to object to those individuals from being brought to court, even with a negative rapid test on the day of the hearing. The latest report submitted by the City of Philadelphia ("City") to the Court indicates that from the period of November 1-5, 2021, anywhere from 33 to 50 incarcerated individuals per day were not brought to their criminal court hearing.

Moreover, reports of increased violence, both between incarcerated people and from staff, in the jails also persist. *See* Scott Decl. ¶¶ 7-8; Flynn Decl. ¶¶ 20-21; Henry Decl. ¶¶ 10-11; Brookins Decl. ¶¶ 4, 17; Randolph Decl. ¶¶ 12-13; Watkins Decl. ¶ 22; Berry Decl. ¶ 11; Braxton Decl. ¶ 23; Tolbert Decl. ¶¶ 5, 12; Copper Decl. ¶ 5; Robinson Decl. ¶¶ 9-10; Forth Decl. ¶¶ 20-21; Washington Decl. ¶¶ 4, 11. There have also been several concerning reports of suicides and suicide attempts. *See* Braxton Decl. 10; Tolbert Decl. ¶ 13; Copper Decl. ¶ 5.

PDP is out of compliance with the Court's Order of September 14, 2021 (ECF No. 93), which ordered that by October 25, 2021, that fully vaccinated incarcerated people would have the right to increased out-of-cell-time, visits from friends and family, on-unit programming, and

access to the law library. The Order also mandated that the jail system maintain correctional staff at the level set forth in the City of Philadelphia's (City) FY 22 budget. Yet, even with the new class of 30 correctional officers, the total number of officers reported by the City, is *fewer* than was reported just two months ago.

To date, visitation from friends and family has not resumed, and incarcerated people still have little or no access to on-site programming or the law library. On November 8, 2021, the PDP submitted a plan to the Court to resume family and friend visitation, and Plaintiffs urge the PDP to communicate this plan to the incarcerated people and to the public, and to take all steps to ensure that visitation is implemented, balancing both public health needs and the mental health needs of incarcerated persons and their loved ones.

As noted, the PDP has conceded that it is not in compliance with the Court's Order of January 28, 2021 (ECF No. 63) establishing a three-hour minimum of daily out-of-cell time. *See* Exhibit B (chart summarizing Deputy Wardens' reports on out-of-cell time). And the PDP has stated that with current staffing, it will not comply with the September 14, 2021 Order, which increases out-of-cell time this month and again in December and January.

Data provided to the Court demonstrate that the staffing crisis in PDP is caused not only by high rates of staff absenteeism, but also by the City's failure to have hired sufficient numbers of corrections officers to properly staff PDP facilities. Given the current population at 4,535 people, the PDP is unable to provide what this Court has ordered in terms of out-of-cell time, and is also unable to return to pre-pandemic operations or to provide basic services required for pre-trial persons under the Fourteenth Amendment. Plaintiffs have held off on a motion for contempt to give the PDP requested time for coming into compliance, but we will file a contempt motion a motion for further relief if compliance is not shown in the near future.

Plaintiffs' counsel will be prepared to discuss these ongoing issues and the currently pending proposed court orders during the court conference.

Respectfully submitted,

/s/ David Rudovsky

David Rudovsky (PA 15168)

/s/ Susan Lin

Susan Lin (PA 94184)

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/s/ Su Ming Yeh

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/s/ Matthew A. Feldman

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/s/ Grace Harris

Grace Harris (PA 328968)

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Bret Grote (PA 317273)

/s/ Nia Holston

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/s/ Rupalee Rashatwar

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/s/ Benjamin R. Barnett

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Ben.Barnett@dechert.com

DATE: November 10, 2021

Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

THOMAS REMICK, et al., <i>on behalf of</i>	:	
<i>themselves and all others similarly situated,</i>	:	No. 2:20-cv-01959-BMS
	:	
Plaintiffs-Petitioners,	:	
	:	Judge Berle M. Schiller
v.	:	
	:	
CITY OF PHILADELPHIA; and BLANCHE	:	
CARNEY, in her official capacity as	:	
Commissioner of Prisons,	:	
	:	
Defendants-Respondents.	:	

CERTIFICATE OF SERVICE

I, Su Ming Yeh, hereby certify that a true and correct copy of Plaintiffs’ Status Report was served upon the following via email and ECF on November 10, 2021.

Craig M. Straw
Anne B. Taylor
City of Philadelphia Department of Law
1515 Arch Street, 14th Floor
Philadelphia, PA 19102-1595

Respectfully submitted,

/s/ Su Ming Yeh
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DATE: November 10, 2021

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THOMAS REMICK, <i>et al.</i>	:	
and all others similarly situated,	:	
	:	CIVIL ACTION NO. 20-1959
Plaintiffs-Petitioners,	:	
	:	(Schiller, J.)
v.	:	
	:	
CITY OF PHILADELPHIA; and	:	
BLANCHE CARNEY, in her official	:	
capacity as Commissioner of Prisons,	:	
	:	
Defendants-Respondents.	:	

DECLARATION OF QAASIM BERRY

I, Qaasim Berry hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 25 years old and currently incarcerated at the Philadelphia Industrial Correctional Center (PICC).
2. I am currently housed on Unit J.
3. I am regularly locked in my cell 24 hours a day for weeks straight without showers or phone calls.
4. I have gone 42 days without being able to take a shower.
5. I have not been able to make any phone calls for the last couple months.
6. These conditions are seriously affecting my mental health. I have had several breakdowns since I have been here.
7. I have multiple mental health diagnoses and I take medications for depression and anxiety.

8. There are many other people on Unit J with mental health conditions as well.

9. In early October, I was left in a cell with three inches of sewage water covering the floor for four days. The water covered my feet when I stood up and my shoes were soaking wet.

10. From October 14-18, 2021, I was housed in a cell with no mattress, just a sheet. Staff took the mattress out of my cell as punishment for an incident that I was not even involved in. I had to sleep on a cold metal frame and it was very painful.

11. On or around August 24, 2021, multiple staff members, including two supervisors, sprayed me with pepper spray and did not decontaminate me after. My cellmate was voicing his opinion to a lieutenant about lack of out-of-cell time, who then gave the order for several staff members to spray pepper spray into the cell. Pepper spray got all over my blankets and bed. My cellmate and I were left in the cell filled with pepper spray for hours. It felt like my skin was on fire.

12. Since I have been incarcerated here, I have been written up several times and found guilty of misconduct allegations without having the chance to dispute the charges. I was not allowed to attend any hearings or present any arguments or evidence in my own defense. I was not given any appeal forms.

13. I was put in the hole in early August 2021 without any kind of hearing.

14. Staff provide food by putting my meal trays on the dirty ground and sliding them under my cell door. There is a slot for food trays built into the door, but staff do not bother to open it and choose to put my food on the floor instead.

15. I am housed at the back of Unit J, where it is particularly filthy. This part of the unit is never cleaned.

16. There is no General Inspection cleaning done on this unit. Staff never provide us with cleaning supplies to clean our cells with.

17. Staff do not distribute clean face masks, soap, or clean sheets.

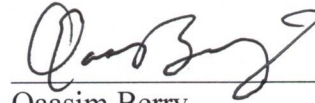
18. We are allowed to sign up for commissary, but we never receive the items we order. This means I have no access to paper, pens, envelopes, or stamps, which makes it incredibly difficult to contact my loved ones or my attorney.

19. I have submitted several grievances about these conditions, but I never get any responses.

20. Currently, staff are not supplying us with any grievance forms, so I have to write out any concerns on regular paper and do not get to keep copies.

21. Last week, I was moved to a different cell, but staff did not transfer over my property. Now, I do not have any of my discovery for my criminal case or the rest of my legal paperwork.

Pursuant to 28 U.S.C. § 1746, I, Qaasim Berry, declare under penalty of perjury that the foregoing is true and correct. Executed this 22nd day of October, 2021.

A handwritten signature in black ink, appearing to read 'Qaasim Berry', written over a horizontal line.

Qaasim Berry

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THOMAS REMICK, <i>et al.</i>	:	
and all others similarly situated,	:	
	:	CIVIL ACTION NO. 20-1959
Plaintiffs-Petitioners,	:	
	:	(Schiller, J.)
v.	:	
	:	
CITY OF PHILADELPHIA; and	:	
BLANCHE CARNEY, in her official	:	
capacity as Commissioner of Prisons,	:	
	:	
Defendants-Respondents.	:	

DECLARATION OF CALAR BRAXTON

I, Calar Braxton hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 47 years old and currently incarcerated at the Detention Center (DC).
2. I am currently housed on Unit C.
3. The conditions on Unit C are horrible.
4. There is an infestation of rats, mice, and bugs. I asked several staff members for mouse traps and when I was able to put some out, there were multiple mice in each trap.
5. I have never seen an exterminator on the unit.
6. The building seems to be decomposing, with water leaks everywhere and what looks like black mold growing on the walls.
7. The windows do not close properly so it is often freezing cold.
8. I have been in multiple different jails in my life, including federal prison, but I have never been housed anywhere as bad as DC.

9. On Sunday, October 24, a woman attempted suicide by jumping off of the top tier of the unit.

10. There are many women on this unit with mental health issues who do not seem to be receiving proper care. Women often get cleared from the mental health ward housed above us and are brought to Unit C, but they seem to still have issues that need to be addressed. Sometimes these women throw things, scream at people, and attack other incarcerated people. This adds a lot of tension to the unit.

11. There are also women detoxing from drug use who are struggling and do not seem to be getting detox medications. I often hear women screaming for help and because I am a worker, sometimes the COs tell me to go check on them. Women have told me that they are detoxing and in a lot of pain. Staff do not provide anything when this happens and do not send these women to medical for attention.

12. The medical care here is very poor in general. I have not been getting all of my medications. I have put in three sick calls to request the medications that I need. These are medications that I received in the Federal Detention Center, where I was housed before entering PDP custody.

13. Unit C does not receive three hours of daily recreation. We are lucky to come out two hours of a day. There are days when we do not receive any recreation.

14. I have been at DC for a month and I have never gone outside. We do not get any yard time at all.

15. The unit is very dirty and staff do not follow proper COVID-19 cleaning protocols.

16. Phones, tablets, and showers are not cleaned between uses.

17. We are supposed to receive cleaning supplies to clean our cells on Wednesdays and Sundays, but it is not consistent.

18. When I was first put in my cell, it was filthy, with rat droppings and urine on the floor.

19. I only have one face mask.

20. We have not received new face masks on this unit in about a month and a half. The face mask I have is too large and does not stay on my face properly, so it frequently slips below my nose.

21. We do not receive bars of soap every week.

22. I received a new jumper that was supposed to be clean but it was so dirty that I had to wash it out in my toilet before I could wear it.

23. On October 22, 2021, while I was passing out food, I was attacked by another incarcerated woman, who seemed to have mental health issues. There was only one CO monitoring the unit when the assault occurred and she was just sitting in the bubble, a booth for staff members directly above Unit C. The CO told me that she saw everything, but she did not leave the bubble to intervene.

24. DC is clearly understaffed. I often see the same staff member working double shifts.

25. There are no cameras in this facility, so I worry that when violence and suicide attempts occur, there is no record.

Pursuant to 28 U.S.C. § 1746, I, Calar Braxton, declare under penalty of perjury that the foregoing is true and correct. Executed this 29th day of October, 2021.


Calar Braxton

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THOMAS REMICK, <i>et al.</i>	:	
and all others similarly situated,	:	
	:	CIVIL ACTION NO. 20-1959
Plaintiffs-Petitioners,	:	
	:	(Schiller, J.)
v.	:	
	:	
CITY OF PHILADELPHIA; and	:	
BLANCHE CARNEY, in her official	:	
capacity as Commissioner of Prisons,	:	
	:	
Defendants-Respondents.	:	

DECLARATION OF CEDRICK BROOKINS

I, Cedrick Brookins, hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 30 years old and currently incarcerated at the Detention Center (DC).
2. I am currently housed on Unit B, which is a segregation unit.
3. On August 9, 2021, my cellmate and I were sent to disciplinary segregation for trying to come out of our cells after seven days of being locked in on Unit H at Riverside Correctional Facility (RCF).
4. On August 10, 2021, after we were transferred to DC Unit B, my cellmate, who was also my friend, was stabbed by another incarcerated person. The Correctional Officers (COs) on staff at the time said that they did not see what happened. There are no cameras on this block.
5. As a result of the stabbing, everyone who was out of their cells when the stabbing occurred received a misconduct.

6. We waited over a month and a half for our hearings, but we did not get a chance to attend any hearing or present evidence in our defense. The hearing officer found everyone guilty.

7. I never received sentencing paperwork or paperwork to appeal the decision.

8. On Unit B at DC, we are rarely permitted to come out of our cells. When we do come out, we only get about 40-45 minutes out-of-cell time. Some days we do not come out at all.

9. I am not able to shower every day because we do not come out of our cells every day.

10. We are not allowed to order commissary on this unit, including necessary hygiene supplies like soap, deodorant, and toothpaste, as well as materials we need to communicate with the outside world, including paper, pens, and stamps.

11. We only receive one roll of toilet paper per week, but sometimes we are given brown paper towels instead.

12. I had a couple extra toothbrushes with me when I was transferred from RCF to DC, but staff confiscated them. I have not been able to buy another one.

13. Staff provide meals very early in the day. Sometimes, we get our last meal around 3:30pm and do not get to eat again until the next morning.

14. Because we cannot access commissary, we cannot supplement the minimal amount of food provided by the facility.

15. I feel like I am wasting away in here. I have already lost about 20-25 pounds since being incarcerated. When I first arrived, I weighed about 195-200 lbs. At my first physical, I weighed around 185 lbs. When I got on the scale after about two months at DC, I was down to 175 lbs. When I got here, I wore medium or large t-shirts. I have lost so much weight, that now I wear a small.

16. Staff are incredibly disrespectful and curse at us when we try to speak out about how we are treated on this unit. They treat us like we are less than human beings.

17. I have seen COs beat an incarcerated person on this unit while he was handcuffed.

18. I have asthma and during the summer months it was difficult to breath because DC has poor ventilation and it was very hot. I wrote to medical expressing that I was having trouble breathing and it took three or four days for them to respond.

19. Our legal mail has been severely delayed. My criminal lawyer sent me discovery that I did not receive until around a month and a half after it was postmarked. The postmark showed that it was sent in mid-April, but I did not receive it until the end of May or early June. I wrote a grievance about this issue, but I did not get a response.

20. It takes a month for me to receive mail from my family or for my family to receive mail from me. This is especially difficult given that I cannot call them regularly because I am in the hole.

21. Every 15 days we are supposed to be able to make a phone call to our loved ones. However, today, was supposed to be that day and staff told us that we would not be able to use the phones. A lot of the people on the unit are very disappointed because we had been looking forward to talking to our families for the last two weeks.

22. Unit B is very dirty. We do not have trashcans in our cells, so we have to slide our trash under the door to be collected. Sometimes the trash just sits outside our cells.

23. There is a bad infestation of mice and cockroaches on this unit.

24. For the two months that I have been on this unit, we have not received any cleaning supplies to clean our cells. I have to save up the soap that we receive to clean our bodies to use with my washcloth to clean my toilet.

25. Laundry has only been done around three times in the past two months.
26. We have not received clean linens or uniforms in the last month.
27. We only sporadically receive face masks and soap every few weeks. We cannot buy our own hygiene products to fill the gaps.

Pursuant to 28 U.S.C. § 1746, I, Cedrick Brookins, declare under penalty of perjury that the foregoing is true and correct. Executed this 15th day of October, 2021.

C. Brookins (CB)
Cedrick Brookins

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Plaintiffs-Petitioners,	:	
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v.	:	
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CITY OF PHILADELPHIA; and	:	
BLANCHE CARNEY, in her official	:	
capacity as Commissioner of Prisons,	:	
	:	
Defendants-Respondents.	:	

DECLARATION OF NORMAN COPPER

I, Norman Copper, hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 30 years old and currently incarcerated at PICC.
2. I am currently housed on Unit G1, in cell 30.
3. I am getting about 45 minutes to an hour out of my cell every day, but there are some days when I do not get out at all. If the whole top tier gets let out at once, it is impossible for everyone to use the phone, tablet, and get a shower. Controversy is always going to happen when we are let out. There are never enough phones working properly. I was in CFCF previously, and over there all the phones were operating. Here, however, only 4 out of the 7 phones work. I don't understand why 3 phones never work. There are not enough showers for everyone who gets let out of their cells. It feels like the staff are intentionally creating a hostile environment.
4. The conditions on my block are ridiculous. There are mouse and roach infestations, and I have even seen a cat roaming around the block. It feels like an abandoned house. There are

water bugs. It would feel safer for me if I was upstate in prison surrounded by people serving life, and much more serious charges. The conditions here are way worse than in prison.

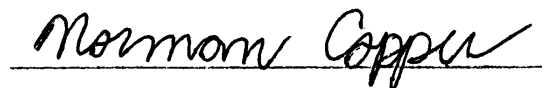
5. In July 2020, I was living on quarantine for 38 days without any commissary. While I was on quarantine, a guy hanged himself. His cellie was banging for help for hours. People were getting hurt left and right. The crazy thing is that we were coming out more in quarantine than how often we are let out right now. Everyone there was wearing the same underwear and clothing for that entire month.

6. Once while in quarantine, I saw a guy getting beat up by guards.

7. We are not given any cleaning supplies. It seems like only the unit workers are getting access to cleaning supplies. Just doing basic functions like cleaning has to be accomplished from knowing the right people and being social. If you're a person who doesn't know anybody or talk to anybody, you will never get cleaning supplies.

8. We do not get any access to a law library. I have had to have my lawyers mail me stuff to be able to be involved in my case.

Pursuant to 28 U.S.C. § 1746, I, Norman Copper, declare under penalty of perjury that the foregoing is true and correct. Executed this 4th day of November, 2021.

A handwritten signature in black ink that reads "Norman Copper". The signature is written in a cursive style and is positioned above a solid horizontal line.

Norman Copper

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THOMAS REMICK, <i>et al.</i>	:	
and all others similarly situated,	:	
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Plaintiffs-Petitioners,	:	
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	:	
CITY OF PHILADELPHIA; and	:	
BLANCHE CARNEY, in her official	:	
capacity as Commissioner of Prisons,	:	
	:	
Defendants-Respondents.	:	

DECLARATION OF ZYEN CORKER

I, Zyen Corker, hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 21 years old and currently incarcerated at PICC.
2. I am currently housed in Unit C in cell 2.
3. I am getting about an hour out of my cell every day, but there are some days when I do not get out at all and other days when I only get out for 45 minutes. The jail really does not have enough guards to operate so we are not getting out of our cells that much.
4. It is really hard to balance our time when we only have an hour out of our cells. We are expected to shower, use phones, use tablets, and also get yard time in just one hour. It is never enough time. There are only 4 phones, 3 showers, and 2 tablets available for 50 people. There is hardly enough of anything to go around.
5. In late October, a flood was started on my block and toilet water flooded my cell. The water was contaminated with urine and I don't even know what else. There was almost a foot

of water that remained stagnant inside my cell for 48 hours. Our cell doors were never opened for us to empty the water from the cells. My slides (sandals) were floating. As a result, I had to soak up the water with an old shirt and wring it out in the toilet. All my clothing and food got wet and ruined. This really exacerbated the problem with mice.

6. We are not given any cleaning supplies. The last time our cell got cleaned or we were permitted to clean with cleaning supplies was eight or nine months ago. It is very unsanitary.

7. The vents look filthy, and sometimes I even see dirt coming out of the vents.

8. We do not get any clean sheets, towels, or rags. We are being forced to use the same linens for more than a year. I had to rip off strings off an old mask to get anything close to a rag for cleaning purposes.

9. Sometimes we sit in the dark all day because we do not have light switches in our cells. We have to yell out to guards to ask them to turn the lights on, and if they do not feel like doing it, we don't have lights.

10. Nobody cleans the showers and on my unit, there are severely mentally ill people who poop and pee in the showers. One time after showering, I started breaking out all over my body. I had bumps everywhere. I submitted a sick call, but nobody responded to it. I had to get family support to make the jail pay attention to my medical issue. I think I was having an allergic reaction.

11. I have filed a lot of grievances, but I have never once gotten a response.

Pursuant to 28 U.S.C. § 1746, I, Zyen Corker, declare under penalty of perjury that the foregoing is true and correct. Executed this 4th day of November, 2021.

A handwritten signature in black ink, appearing to read "Zyen Corker", written over a horizontal line.

Zyen Corker

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THOMAS REMICK, <i>et al.</i>	:	
and all others similarly situated,	:	
	:	CIVIL ACTION NO. 20-1959
Plaintiffs-Petitioners,	:	
	:	(Schiller, J.)
v.	:	
	:	
CITY OF PHILADELPHIA; and	:	
BLANCHE CARNEY, in her official	:	
capacity as Commissioner of Prisons,	:	
	:	
Defendants-Respondents.	:	

DECLARATION OF CARLOS DUPREY

I, Carlos Duprey, hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 49 years old and currently incarcerated at Riverside Correctional Facility (RCF).
2. I am currently housed on Unit H in cell 25.
3. On Unit H, our out-of-cell time is very inconsistent and we are locked in for the vast majority of the day every day.
4. We thought that out-of-cell time would improve as the COVID-19 pandemic lessened in the community, but it has been getting worse.
5. For the past week, we have been coming out for about half an hour to an hour per day.
6. Some days we do not come out at all.

7. We can see the Corrections Officers (COs) sitting in the bubble, a small security booth between Unit H and Unit G, playing games on the computer instead of letting us out of our cells.

8. COs do not do tours to check on us in our cells.

9. I have several chronic medical conditions including diabetes, high blood pressure, anxiety, and post-traumatic stress disorder.

10. I have had hypoglycemic events and anxiety attacks in my cell with no way to ask staff for help.

11. The emergency button system does not work, so I cannot alert anyone when I need immediate medical attention. When I press the button in my cell, nothing happens.

12. COs and supervisors on this unit have a bad habit of pulling out their pepper spray, even when it is not necessary. They often threaten us with pepper spray just for trying to talk to them or asking why we are locked in all the time.

13. I have filed grievances about our lack of out-of-cell time and access to medical care, but I have not received any responses.

14. I was in a car accident before I was incarcerated and doctors at Temple Hospital told me I needed physical therapy. The physical therapy was approved when I was housed at Philadelphia Industrial Correctional Center (PICC), however they did not actually start the treatment. I put in three or four sick calls when I got to RCF, and it still took another six weeks before they started providing me with the prescribed physical therapy.

15. When I arrived on Unit H in September, we were put on quarantine for over a month.

16. During the quarantine, we were tested for COVID-19 three times and I tested negative each time. No one else on the unit seemed to be testing positive or being taken off the unit after each round of testing. When I asked why were still on quarantine, staff said they did not know.

17. Many people on the unit missed court dates and attorney visits because we were on quarantine, even though it seemed like there was no reason for us to be on quarantine for that long.

18. Because our out-of-cell time is so limited, I do not get a chance to shower every day.

19. We do not receive hygiene supplies like soap, toilet paper, and face masks every week.

20. I have seen staff instruct incarcerated workers to forge our signatures on signature sheets, indicating that we received supplies and recreation time when we did not.

21. In the seven weeks I have been on this unit, we have only received clean laundry twice. The second time they came around, they did not have towels or sheets.

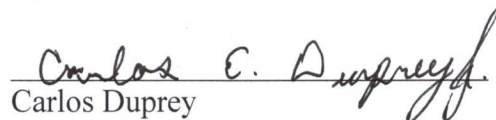
22. The showers on this unit are particularly filthy and are not cleaned.

23. Latches were installed on all the cell doors so they can only be unlocked manually from the outside, one by one. I am concerned that this is a fire hazard.

24. I have not been able to go to the law library since I have been at RCF. I have asked but no one seems to know when we are allowed to go.

25. When I first entered PDP custody in January 2021, I was held in a very small receiving room at Curran-Fromhold Correctional Facility (CFCF) for six days with 11 other men. We had to sleep on the floor or benches. We were only allowed to shower once and use the phone twice in those six days.

Pursuant to 28 U.S.C. § 1746, I, Carlos Duprey, declare under penalty of perjury that the foregoing is true and correct. Executed this 22nd day of October, 2021.


Carlos Duprey

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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Defendants-Respondents.	:	

DECLARATION OF MICHAEL FLYNN

I, Michael Flynn, hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 64 years old and currently incarcerated at Riverside Correctional Facility (RCF).
2. I am currently housed on E Unit.
3. On September 2, 2021, I fell in my cell and injured my hand. A Physician Assistant ordered pain medication and an x-ray on September 3, 2021, but I was not given any medical treatment until September 7, 2021. I was told that this was because our unit was on quarantine status. I was never given an ice pack and did not receive any pain medication until five days later.
4. Five days after my injury, on September 7, 2021, when I was finally able to get an x-ray, the scan revealed that my hand is fractured. I was given Ibuprofen and told that I would be taken to an orthopedic doctor, but was not taken for several weeks or given any other treatment or pain medication in the interim.

5. After 32 days of pain and concern about long-term damage, I was finally taken to the hospital on October 4, 2021, and a cast was put on my hand.

6. I filed multiple sick call slips and grievances, but was not properly treated for a month.

7. During the quarantine period, four people were moved on to the unit and civilian staff members came on and off the unit. Given that the unit did not seem to be strictly quarantined, I do not understand why I was not taken to medical for a serious injury until after the quarantine period ended.

8. We were not tested for COVID-19 during the quarantine period, we were just given one temperature check.

9. On E Unit we do not come out of our cells every day.

10. When we do come out of our cells, it is for about an hour or an hour and a half.

11. Staff do not always come to work on the weekends, so when we do come out on the weekends, it is typically only for about 15-20 minutes.

12. We have endured periods of severe lockdowns. For example, from August 3-August 17, 2021, we only came out about four times to shower, for about 15 minutes each time.

13. We did not receive commissary during those two weeks either.

14. We still do not come out of our cells every day. For example, on September 24, 2021, only people in 16 cells were allowed to come out.

15. When we do not come out of our cells, we cannot take showers or use the phones.

16. There are signature sheets to track out-of-cell time, but staff direct a small group of incarcerated people to forge our names, indicating that we came out even when we did not. I have

not signed a signature sheet in about a month, but I see other incarcerated people fill them out for everyone each day.

17. There is one Correctional Officer (CO) who staffs E Unit who, rather than going through the formal misconduct process, will penalize incarcerated people on the unit with “time outs” for alleged violations. Instead of issuing a write-up, she keeps people in their cells who she believes have broken rules, reducing their out-of-cell time or denying it altogether depending on the “infraction.”

18. A few weeks ago, she denied my cellmate and me morning recreation because she said our window was covered.

19. Mail is not being distributed every day. I have seen legal and personal mail just sitting on the CO’s desk for 24 hours.

20. In July 2021, someone on my block was badly stabbed by another incarcerated person.

21. The facility is so short-staffed that it takes a while for staff to respond to incidents of violence. It is very frightening to not know whether there will be staff available to stop an assault.

22. Sliding bolt locks were placed on all cells on E Unit in August 2021. I am very concerned that these new locks pose a fire safety hazard as they must be manually unlatched in order for the cell door to open.

Pursuant to 28 U.S.C. § 1746, I, Michael Flynn, declare under penalty of perjury that the foregoing is true and correct. Executed this 24th day of September, 2021.



Michael Flynn

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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Defendants-Respondents.	:	

DECLARATION OF DONOVIN FORTH

I, Donovan Forth, hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 29 years old and currently incarcerated at CFCF.
2. I am currently housed on Unit D2P4 in cell 7.
3. I do not get out of my cell every day.
4. For example, I came out today for an hour and a half. On Wednesday, I did not come out of my cell at all. On other days this week, I usually got anywhere between a half hour to two hours of time outside my cell.
5. I have been incarcerated since January 2021.
6. I have major medical issues from being shot in my face in November 2018. Because of that injury, I had to get two eye surgeries including a corneal transplant. Doctors have prescribed me specific and regular medication to manage my condition.

7. I provided the jail with a list of the medication I require when I was first arrested, but they did not supply that medication to me. Even after I submitted numerous sick call slips, I still struggled to get all the right medication I need to manage my corneal transplant.

8. Because I was not getting the regular eye medication that I need, my corneal transplant rejected and I lost vision in my right eye. I was rushed to the hospital from jail in February 2021. Even after that emergency attention, I now suffer permanent damage to my vision and have developed glaucoma.

9. I repeatedly put in sick call slips complaining about extreme eye pain, but the sick call slips go unanswered.

10. When I was first arrested on January 12, 2021 and put in jail, I was in a pre-population unit at CFCF in A2P1 cell 23. While I was there, I noticed block workers handling food who were not wearing a mask and not using any serving gloves. I ended up contracting COVID in that unit in jail at the end of January 2021.

11. I was then sent to DC, where I was in an annex room where other COVID-positive incarcerated people were. While I was there, I woke up in cold sweats with chest pains and terrible migraines and it was hard to breathe. The pain was unbearable. I requested urgent medical attention, and the nurses just checked my blood pressure and temperature and told me to drink water and go for a walk. I had no ability to do any laundry at this location and I spent nine days there. I was never tested before being returned to general population.

12. I have never had more than one mask at a time, and I have to wash the mask myself.

13. My preliminary hearing in my criminal case keeps getting reset and postponed. It was postponed from January to March and then most recently to September. I had court set for September 27 and September 29, 2021.

14. I was given a rapid test on Sunday September 26, 2021, so that I could go to court. I was never told the results, but I believe I was negative. I am vaccinated against COVID-19.

15. However, I was not taken to court on Monday, September 27 or Wednesday and I have no idea why. I called my lawyer to figure out what was going on. I was told that someone on my block may have self-reported they had COVID and that because of this nobody on my entire block could go to court.

16. I was not taken to virtual court on Monday. I was not taken to virtual court on Wednesday. My case was reset yet again, and I am afraid that on that date I will again be denied my chance to go to court because of something outside of my control.

17. There are emergency buttons in each cell. One time I got lightheaded and thought I was going to pass out because of a heart condition. I pressed the emergency button and it took about ten hours before anyone came to my cell. I pressed it around 9:30pm. When this happened, sometime in March 2021, I was in A2P1 cell 23. The next morning, I was finally able to get emergency medical attention.

18. When the button is pressed there is a loud beeping noise inside the cell. Any guard who is walking the block will definitely be able to hear that noise. The noise cannot be turned off by anyone inside the cell. It was scary to go through that because knowing that I was never going to get urgent medical attention almost gave me a panic attack, making my condition even worse.

19. My medical file includes a specific notation that I cannot get pepper sprayed because of my eye condition. Because of my eye transplant any pepper spray could extremely compromise my transplanted cornea and my ability to see. I know this notation is in my file from my time at SCI Phoenix.

20. Nonetheless, my cellie was pepper sprayed in January 2021 and he was not sent to medical or to the hole. He was sent back to our cell and while in the cell, the pepper spray was all in the air and traveled from his body to other parts of the cell, including the mattresses, the sheets, and the towels.

21. I could smell the pepper spray in the air and it made me cough repeatedly. I covered my eyes out of extreme caution, but I was exposed to the pepper spray anyway. I ended up going without a mattress for 4 days because of this and sleeping on a steel bunk.

22. Since I have been here, I am not given any access to the brooms, mops, or any chemicals I need to clean my cell. Only block workers can access these products. Our cells are filthy and we repeatedly ask for cleaning products but are not given these items. I don't get any hand sanitizer or bleach or disinfectant. All I have is a bar of soap.

23. I am prescribed medical shake meal supplements, because of my jaw injury from getting shot. It is painful for me to eat solid food. The meal shakes are often stolen by other inmates and never replaced. As a result, I am often not eating enough. For example, yesterday I did not get my morning, afternoon, or evening meal supplement, so all I ate was oatmeal that I got from commissary. Sometimes I am so hungry that I go to bed crying, so I try to drink so much water that I feel full.

24. I keep asking for help from medical and mental health and I never know when those calls will get answered and when they won't.

25. I already lost my sight one time. I am afraid that because of the medical neglect at the jail that it is going to happen again.

Pursuant to 28 U.S.C. § 1746, I, Donovan Forth, declare under penalty of perjury that the foregoing is true and correct. Executed this 1 day of October, 2021.

A handwritten signature in cursive script that reads "Donovan Forth". The signature is written in black ink and is positioned above a horizontal line.

Donovin Forth

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THOMAS REMICK, <i>et al.</i>	:	
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	:	
Defendants-Respondents.	:	

DECLARATION OF LEVI GUPTON

I, Levi Gupton hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 48 years old and currently incarcerated at the Detention Center (DC).
2. I am currently housed on Unit E.
3. From August to October 2021, I was working in the medical department at DC and I have been very concerned about what I saw there.
4. I witnessed men being treated for gunshot wounds develop bad bed sores because medical staff did not change their bed linens or bed pans frequently enough. I saw men sitting in their own urine and fecal matter for hours.
5. Several nurses quit while I was working there and there seemed to be far fewer medical staff than normal. The current staff seemed very overworked.
6. In early October 2021, after I voiced my concerns about the treatment being provided to other incarcerated people, I was fired from my position in the medical department.

7. I have personally had a very difficult time receiving medical care since I have been on at DC.

8. Last year, medical staff told me that I have high blood pressure and that I am on the verge of developing diabetes. As a result, I am supposed to have my blood pressure monitored three times per week.

9. However, I have not been seen consistently for this recommended monitoring, especially since I was fired from my job in the medical department.

10. I currently experience frequent lightheadedness and migraine headaches and I am worried that my physical health is worsening without proper monitoring.

11. I submitted several sick call slips three or four weeks ago, but I have not heard from anyone in the medical department.

12. I have talked to many other people on my unit who are experiencing the same lack of responsiveness when they seek medical care.

13. DC is a particularly dirty jail, and Unit E is not cleaned regularly.

14. We do not receive any cleaning supplies to clean our sleeping areas. We have to use our limited personal hygiene supplies to clean.

15. We do not have enough toilet paper. This week I had to beg for a roll. Often, COs curse at us when we ask for more toilet paper.

16. We often request to speak to supervisors when COs refuse to provide us with supplies, however supervisors only seem to come onto the unit when they are escorting someone to the hole.

17. We have not received new face masks on this unit in about a month and a half. The face mask I have is too large and does not stay on my face properly, so it frequently slips below my nose.

18. Staff often do not wear their masks while in the facility.

19. E Unit is a dorm, which means we have phones and showers accessible to us; however, we have only very limited time out of our small cubicle areas.

20. I do not have any room to walk around or exercise. I am concerned that the lack of exercise is exacerbating my medical issues.

21. Staff still require us to sign out-of-cell time sheets, even if we do not come out.

22. A captain on Unit E often threatens to take away the tablets and turn off the phones if we do not sign the sheets.

23. We have 90 people on the unit, but there are only two tablets. People frequently fight over getting on the tablets, and it causes a lot of tension on the block.

24. We often sign up for razors, but we do not receive them.

25. Legal mail is very slow and when we do receive it, it has already been opened outside of our presence and then retaped closed.

26. We are not permitted to go to the law library.

27. We are not permitted to go outside. I have only been to the yard one time since I was transferred to DC in May 2021.

Pursuant to 28 U.S.C. § 1746, I, Levi Gupton, declare under penalty of perjury that the foregoing is true and correct. Executed this 15th day of October, 2021.


Levi Gupton

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THOMAS REMICK, <i>et al.</i>	:	
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BLANCHE CARNEY, in her official	:	
capacity as Commissioner of Prisons,	:	
	:	
Defendants-Respondents.	:	

DECLARATION OF DWAYNE HENRY

I, Dwayne Henry, hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 32 years old and currently incarcerated at the Detention Center (DC).
2. I am currently housed on Unit B, which is a segregation unit.
3. There are not regular Correctional Officers (COs) on this block. The block is staffed by CERT team members.
4. When I was transferred, none of my property was transferred with me, including all my legal papers and research.
5. On Unit B, we are not allowed to order stamps, envelopes, paper, or writing utensils.
6. I have a pending civil case but now I do not have the means to contact the court.
7. We are not allowed to use the phones on Unit B.
8. There are no security cameras at DC, which makes me feel very unsafe.

9. A CO told me that I was probably put in a cell by myself so that staff could assault me without anyone seeing.

10. On September 1, 2021, multiple COs came to my cell around 9pm and sprayed me with pepper spray for no reason. I was not causing a disruption or posing a danger to myself or others. After pepper spraying me, they left me in the contaminated cell for 30 minutes. Then, they removed me from my cell and placed me in what looked like a dog's cage. I was handcuffed in the cage when they started spraying me with pepper spray again.

11. After the assault, my skin burned for hours. I was never decontaminated. I thought they were trying to kill me.

12. I believe this assault was in retaliation for my reporting concerns about the conditions in the jails and helping other incarcerated people make reports.

13. I was transferred to DC from Philadelphia Industrial Correctional Center (PICC) Unit J on or around October 15, 2021.

14. PICC Unit J is also a segregation unit, and we very rarely came out of our cells while I was housed there.

15. On some occasions, we were locked in our cells without access to the phones or showers for weeks at a time.

16. I personally was not let out of my cell for recreation for the entire month of September. I did not have a phone call or a shower in September.

17. As a result of these lockdowns, many of us on Unit J developed mental health problems.

18. We had very limited access to mental health professionals. I put in several sick calls to speak to the psych department, but I was not seen.

19. There was one man on the unit, in cell 13, who has mental health issues and I could hear him talking to himself every day and crying and wailing every night. He never came out of his cell and I am worried that no one is caring for him.

20. I was transferred to the disciplinary segregation unit on July 29, 2021. I was never permitted to attend a hearing or present evidence in my defense.

21. In August, I had to ask a CO to let me see my misconduct report, because I had never received one.

22. I have received disciplinary hearing summary reports for the misconduct allegations against me. The report forms are barely filled out. There are no signatures where it indicates there should be hearing examiner and supervisor signatures. The forms indicate that I pled “not guilty” to the misconduct allegations, but I was never asked how I wanted to plead.

23. Everyone else on Unit J who I spoke to has received the same form without being able to attend a hearing.

24. Unit J was incredibly unhygienic.

25. Sometimes the toilets were blocked and fecal matter and urine flowed onto the floor of the block and into other cells.

26. There was fecal matter on the ground of my cell around the door from the last person who was housed in my cell. Staff served me my food by sliding it under the door through the contaminated area.

27. Staff refused to even open up the slot in my cell door to give me my food in a more hygienic way.

28. We were not permitted to clean our cells. We did not receive any cleaning supplies.

29. Staff did not distribute bars of soap.

30. Staff did not distribute new cloth face masks.

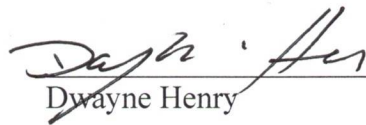
31. I only received clean sheets once in the two months that I was housed on J Unit, and I had to beg for them.

32. Unit J was on quarantine status for about four weeks. I was never tested for COVID-19 during the quarantine. I only had my temperature checked once.

33. According to my attorneys I had multiple legal calls cancelled due to being on quarantine. One was scheduled for September 7, 2021 and one was scheduled for September 23, 2021. On both occasions, my attorneys have informed me that they were told by PDP staff that I was unavailable because of the quarantine on Unit J.

34. I have not been able to go to the law library at DC or PICC.

Pursuant to 28 U.S.C. § 1746, I, Dwayne Henry, declare under penalty of perjury that the foregoing is true and correct. Executed this 30th day of October, 2021.



Dwayne Henry

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Defendants-Respondents.	:	

DECLARATION OF ANTOINE RANDOLPH

I, Antoine Randolph, hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 41 years old and currently incarcerated at Curran-Fromhold Correctional Facility (CFCF)
2. I am currently housed on Unit A2P4.
3. I was initially housed on Unit B1P1, which is a quieter unit that mostly houses older men, but I was transferred to Unit A2P4 on October 15, 2021, which houses mostly younger men.
4. On this unit, it is hard to get on the phone or the tablets because certain people monopolize them. The staff do not interfere or do anything to make sure everyone can make calls.
5. On or around September 23, 2021, I was transferred from CFCF to Detention Center (DC) Unit A, which is used both as a COVID-19 isolation block and a segregation block for people in disciplinary or administrative custody.

6. My understanding is that I was transferred because someone in my cell tested positive for COVID-19. I did not test positive for COVID-19.

7. While on DC Unit A, I was tested for COVID-19 three times and tested negative each time.

8. I was still held on DC Unit A for 19 days, despite not having COVID-19.

9. I was very concerned because other people on Unit A had COVID-19 and I did not. I feel that I was being continuously and unnecessarily exposed to COVID-19.

10. A Correctional Officer (CO) on Unit A told me that I was there because there was not any space for me anywhere else.

11. I missed three court dates while on Unit A because the unit was on medical lock.

12. DC A Unit is very violent. I witnessed multiple stabbings in the 19 days I was housed there.

13. I saw staff members just watching a fight between incarcerated men until it was over.

14. We did not come out of our cells every day on Unit A.

15. We were allowed to come out about every other day for about 45 minutes or one hour.

16. As a result, we could only shower or use the phone every other day, if that.

17. Unit A was incredibly dirty. There were mice and bugs all over the unit, as well as dust everywhere and cracks in the walls.

18. The first cell I was given had mouse droppings all over the bed.

19. We were not given any supplies to clean our cells. I used the soap that we are given to clean our bodies and my washcloth to clean my cell because I had no other supplies.

20. In the two weeks I was on the unit, I did not have the chance to do any laundry. I did not receive a uniform or linen exchange. I washed my uniform in the shower when I can.

21. I still have the same uniform I was given when I got here on August 20, 2021.

22. At CFCF on Unit A2P4, our out-of-cell time is very inconsistent.

23. They do not seem to run recreation for enough of the day for everyone to come out each day. When we do come out it is only for a couple hours.

24. I am housed in a multipurpose room with three other people. We do not have a window.

25. Unit A2P4 is not cleaned regularly.

26. The cell I was given is incredibly dirty. Staff did not give me anything to clean it. I asked, but they said I had to wait to ask the morning staff. I asked the morning staff, but they ignored me.

27. I only have two face masks. When I ask staff for a new one, they say they do not have them anymore. I keep washing my masks to try to keep them relatively clean.

28. We do not receive enough toilet paper. We have been asking for some, but staff tell us there is none to distribute. I have had to use a rag to wipe myself.

29. I have been in PDP custody for almost two months, and I have not received any mail.

30. My wife told me that she sent me mail that was sent back to her with my name crossed off. I have also sent her mail that she has not received.

Pursuant to 28 U.S.C. § 1746, I, Antoine Randolph, declare under penalty of perjury that the foregoing is true and correct. Executed this 15th day of October, 2021.

A handwritten signature in black ink, appearing to read "Antoine Randolph", written over a horizontal line.

Antoine Randolph

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	:	
Defendants-Respondents.	:	

DECLARATION OF CAEZ ROBINSON

I, Caez Robinson, hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 24 years old and currently incarcerated at CFCF
2. I am currently housed on C2P1 in cell 12.
3. I am getting about two hours out of my cell every day, but there are some days when I do not get out at all.
4. There are only about two or three phones working at a time on my unit. A lot of people will fight over the phones because there aren't enough phones for the whole block and nobody gets enough time out of their cell with the phone.
5. I have had a damaged mask that keeps slipping off my ears. I have repeatedly asked staff for a new mask, but they have not given me one. I have been asking for a new mask for three weeks. I recently got a new mask from another inmate, and when that mask becomes damaged or no longer useable, I don't know how or when I will be able to get a mask.

6. I entered jail in June 2021. I spent three days in the intake receiving room sleeping on the floor in a tiny, crowded room with eight people. I did not sleep at all. People slept on the bench, under the bench, and just on the floor. We were all cramped in a tiny room. I had no idea if other people had COVID, and it felt very unhygienic. I was going through withdrawal at the time, and I was throwing up. I was given 3 cold packs a day, which consisted of two pieces of bread, one piece of meat, and mustard. That was not nearly enough to survive on and we were all starving.

7. When I was on a quarantine unit in June and July of 2021, I was given no toothbrush, toothpaste, or towels, and I was forced to keep the same sheets for 40 days. There was no access to laundry at that time.

8. I am not getting soap, and I am forced to buy my own soap if I want it.

9. I see people get pepper-sprayed almost every day. On one occasion, I saw someone get pepper-sprayed for demanding insulin that was not being provided, a simple verbal argument. I then saw guards attack the person after he was pepper-sprayed.

10. On August 4, 2021, I was stabbed by my cell mate. A guard walked up to my cell and saw the fight happening. Rather than intervening, the guard left the scene and about five minutes later came back with six or seven guards. By that time, the fight had ended. I had to get three stitches to my head from getting stabbed. I was written up for this offense and I was sent to the hole for 30 days.

11. I was never given a hearing after being sent to the hole. I was not told why I was in the hole, and I never had a chance to tell my side of the story. While I was in the hole, I could not call my lawyer or my family.

12. I have had no access to the law library since I have been incarcerated.

13. I have filed ten grievances but never got any responses to them.

14. I am prescribed medication, and I typically go down to medical to take my medication every day. Sometimes the entire unit is not let out to go to medical, so on some days I do not get my medication.

15. Sometimes, lunch is not served on time and we are served two meals at dinner time.

16. Sometimes there will be no guard visible all night, and I never see anyone doing tours of the block.

17. There is an emergency button in my cell that can be pressed, but it is useless. I have touched the emergency button in the past and the button makes a noise and makes a sound like a hospital alarm and flashes brightly. I pressed it to get my medication once, but nobody ever responded. The alarm just kept blaring all night. It was only in the morning that someone came, more than eight hours later. Knowing that nobody is ever going to check on me if there is an emergency is scary. It feels like no one is looking out for us here.

Pursuant to 28 U.S.C. § 1746, I, Caez Robinson, declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day of October, 2021.

A rectangular box containing a handwritten signature in black ink. The signature reads "Caez Robinson" in a cursive script. The box has a light gray, textured background.

Caez Robinson

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THOMAS REMICK, <i>et al.</i>	:	
and all others similarly situated,	:	
	:	CIVIL ACTION NO. 20-1959
Plaintiffs-Petitioners,	:	
	:	(Schiller, J.)
v.	:	
	:	
CITY OF PHILADELPHIA; and	:	
BLANCHE CARNEY, in her official	:	
capacity as Commissioner of Prisons,	:	
	:	
Defendants-Respondents.	:	

DECLARATION OF JOSEPH RUE

I, Joseph Rue, hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 47 years old and currently incarcerated at Curran-Fromhold Correctional Facility (CFCF).
2. I am currently housed on Unit D2P2, which is a vaccinated unit.
3. We do not come out of our cells every day on Unit D2P2. For example, on August 31, 2021, there was no out-of-cell time at all. From September 13-15, 2021, we did not come out of our cells.
4. Due to the lack of out-of-cell time, we are not able to take showers, make phone calls, or walk around and stretch our legs every day.
5. When we do come out of our cells, it is typically for about an hour and a half. On a few occasions, we have come out for an hour and a half on both shifts, but this is not consistent or every day.

6. We never know when we are going to be able to come out or when we are going to be locked in all day.

7. We have been told that the lack of out-of-cell time is because PDP is short staffed.

8. Staff shortages have also affected medical care. I have diabetes and since I have been on this unit, I have missed 4 or 5 blood sugar checks. It is very dangerous as a diabetic to go without monitoring my blood sugar levels.

9. Meals are also being served later and later. For example, on September 1, 2021, at 8pm we still had not received our 5pm dinner. We do not know when are going to be able to eat. As a diabetic, this extreme inconsistency makes it very difficult for me to maintain proper blood sugar levels.

10. Staff no longer distribute essential hygiene supplies. We no longer receive soap regularly. Yesterday, we received soap for the first time in about a month.

11. Block workers rarely clean the unit.

12. Block phones are not cleaned in between uses, so we put socks over the phones so we do not have to touch them.

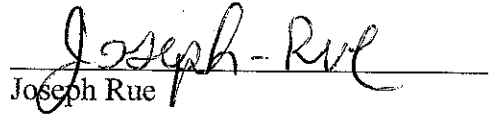
13. We are never given cleaning supplies to clean our cells.

14. Laundry is very inconsistent and depends on whether there are enough staff to supervise the laundry workers.

15. I have not been able to go to the law library for the past year.

16. Legal mail has been very slow. My attorney sent me legal mail from within Philadelphia and I did not receive it until about three weeks later.

Pursuant to 28 U.S.C. § 1746, I, Joseph Rue, declare under penalty of perjury that the foregoing is true and correct. Executed this 24th day of September 2021.


Joseph Rue

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THOMAS REMICK, <i>et al.</i>	:	
and all others similarly situated,	:	
	:	CIVIL ACTION NO. 20-1959
Plaintiffs-Petitioners,	:	
	:	(Schiller, J.)
v.	:	
	:	
CITY OF PHILADELPHIA; and	:	
BLANCHE CARNEY, in her official	:	
capacity as Commissioner of Prisons,	:	
	:	
Defendants-Respondents.	:	

DECLARATION OF QUATEZ SCOTT

I, Quatez Scott, hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 29 years old and currently incarcerated at Riverside Correctional Facility (RCF).
2. I am currently housed on Unit H in cell 35.
3. On Unit H, we do not consistently come out of our cells every day.
4. For example, in mid-August 2021, we were locked in our cells for eight days straight without coming out for showers or phone calls.
5. Aside from the period of severe lockdown, we typically come out of our cells for about 20 minutes to 2 hours per day. It is very inconsistent.
6. We do not have a regular Correctional Officer (CO) on this unit anymore, so every day we have a new guard who seems to decide how to run recreation and how much time we can come out of our cells.

7. The lack of consistent out-of-cell time creates tension and animosity between incarcerated people due to arguments about access to phones and tablets. I am worried about the unit becoming more violent. I do not feel safe here.

8. On September 23, 2021, for example, there was a violent fight between incarcerated people on the unit.

9. We are told that the lack of out-of-cell time is due to staff shortages. On some occasions, I have seen the same CO staff the unit for three shifts in a row.

10. Unit H was on COVID-19 quarantine from August 28 to October 1, 2021. We were only tested for COVID-19 three times, every other week.

11. Many people on the unit missed court dates due to the quarantine.

12. While on quarantine, we were not allowed to have official visits with our attorneys.

13. Medical and security staff both told us that they did not know when we were going to be released from quarantine or when we would be able to go to court or speak to our attorneys again.

14. I put in a sick call about pain in my groin over a month ago, but I have not been seen by any medical staff about this issue.

15. I had to put in two sick call requests and speak to three different nurses before I was given the COVID-19 vaccine.

16. Legal mail has been severely delayed. It took 16 days for my attorney in Philadelphia to receive mail that I sent to him.

17. We often do not receive necessary supplies such as soap, toilet paper, and cleaning products.

18. We are told to sign a paper saying that we have received supplies, even when we do not.

19. I am a block worker, but I am not always let out to clean. When I do not come out, the block is not cleaned at all.

20. Sliding bolt locks have been installed on all cells on Unit H, which must be opened manually before we can come out. I am concerned that these locks are a fire hazard and that if there were an emergency, staff would not be able to let us all out.

Pursuant to 28 U.S.C. § 1746, I, Quatez Scott, declare under penalty of perjury that the foregoing is true and correct. Executed this 6th day of October, 2021.



Quatez Scott

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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and all others similarly situated,	:	
	:	CIVIL ACTION NO. 20-1959
Plaintiffs-Petitioners,	:	
	:	(Schiller, J.)
v.	:	
	:	
CITY OF PHILADELPHIA; and	:	
BLANCHE CARNEY, in her official	:	
capacity as Commissioner of Prisons,	:	
	:	
Defendants-Respondents.	:	

DECLARATION OF JAMES TOLBERT

I, James Tolbert, hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 28 years old and currently incarcerated at PICC.
2. I am currently housed on H2 block in cell 2.
3. I am usually getting only 30 minutes out of my cell each day, but some days I don't get out at all. When I do get out of my cell, I try to get a quick shower and use the phone. I always have to cut something short to try to fit it all in. There are some stretches when I do not get out for 4 or 5 days straight, so I have to use the time I get out wisely. I only have time to talk to one person, so I can only call either my lawyer or my family.
4. We have not had visits in over a year and a half, so I have not seen any of my family in this time. I have two sons, ages twelve and three, and I want to see them. It has been really hard on me.

5. When the guards let us out of our cells, a fight almost always breaks out. Guards give us fifteen minutes to use the phones, and only four out of the seven phones will be working. Everyone will fight to get the chance to speak to their family because they have not spoken to them in weeks.

6. We do not get yard time at all on the third floor. I haven't had any access to fresh air in months.

7. There are sliding bolt locks that have been installed on our doors as a result of the locks that are not working throughout the jail. The locks that are on our cell doors have to be opened manually. They are a safety hazard and should not be allowed. I'm nervous that if there is a fire or flood, I'll be trapped in my cell without any help.

8. When there was a riot in August, there was flooding and water got into my cell through cracks in the walls. There was so much water that it rose to the level of a whole sneaker. Some of my paperwork got messed up during this flood. I had to push the water out with blankets and sheets. We were not given any supplies to clean up the cell.

9. Nobody in the jail has been able to access batteries for almost 4 months now, and as a result we cannot use radios or get any outside news. Being locked inside our cells all day without any access to the news has been really isolating.

10. I filed a grievance three months ago when my commissary was taken from me because of a very disorganized system where anyone can sign for your commissary. I still have not received a response from the jail about my grievance.

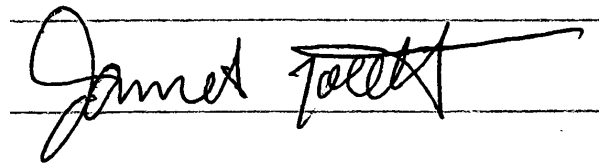
11. I am only given one roll of toilet paper a week, so I run out of toilet paper every week. Other people on my block are dealing with the same issue, and nobody is getting nearly enough toilet paper.

12. Pepper spray has been used so much since incidents happened at PICC in August. Guards use the pepper spray every time there is a verbal exchange they don't like. They pepper-sprayed somebody last night for not going into their cell at the exact time requested. There is often excessive force for no reason.

13. Somebody tried to kill himself a month ago on my block. This place is horrible, and most people are not mentally strong enough to take the kind of treatment we get.

14. I have been placed in the hole in punitive segregation on more than one occasion. The most recent time was a few months ago, and I spent 15 days in the hole in DC. That place is infested with rats and roaches. I was never given a hearing or a chance to defend myself against the charges. Before that I was sent to the hole in March 2020 for a total of 10 months. That time, I was also not given a hearing and or any chance to defend myself. I won't know the long-term impacts of being in solitary confinement until I'm back in the community. But I know something is wrong. I spent so much time in the hole. I think I will be antisocial. I think I developed PTSD.

Pursuant to 28 U.S.C. § 1746, I, James Tolbert, declare under penalty of perjury that the foregoing is true and correct. Executed this 4th day of November, 2021.

A handwritten signature in black ink, appearing to read "James Tolbert", is written over two horizontal lines. The signature is cursive and somewhat stylized.

James Tolbert

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THOMAS REMICK, <i>et al.</i>	:	
and all others similarly situated,	:	
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BLANCHE CARNEY, in her official	:	
capacity as Commissioner of Prisons,	:	
	:	
Defendants-Respondents.	:	

DECLARATION OF TYRI WASHINGTON

I, Tyri Washington, hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 38 years old and currently incarcerated at PICC.
2. I am currently housed on block G1, cell 30.
3. I am getting very little time out of my cell every day, and I don't come out every day. It seems like we get about five hours out of our cells a week and on weekends we don't get out of our cells at all. On afternoon shifts, guards only let four cells out at a time, but on morning shifts they let out more people.
4. When there are as many as 50 people out at a time, everyone is expected to use the shower and tablets and phone. A fight will almost always break out because there are not enough phones or tablets to go around, and then we end up getting punished for something that ends up happening every day. Because it is so unexpected when I am let out of my cell, I have a really hard time reaching my family by phone.

5. We have no access to the law library.

6. We have no access to the gym and nobody on my unit ever gets brought to the yard.

I have a medical condition and really want to get exercise for my body, but I have no way to exercise. I get no fresh air. I am cramped in a tiny cell with another guy.

7. I am also supposed to be getting regular medications for my glaucoma, but I am being forced to stretch my medication by only taking less than half the recommended dosage. My doctor has told me that not taking the proper dosage is like not taking any medication at all. I am also not being given all the medications I need for another condition that I have. I complain about the problem, but nobody does anything about it, or tries to help me get the right medication dosage. When I was at CFCF, this was not a problem for me. At PICC, I am not getting my regular doses of medication.

8. I do not get a GI day, which is the day when we would get to clean our cells. We are told that we don't get cleaning supplies in case we are suicidal. I guess they are worried we will drink the cleaning supplies, but we really need to clean our cells.

9. There are floorboards nailed to the ceiling to stop the water dripping down from the ceiling.

10. The conditions here are so bad that I see mice and roaches all the time. I have even seen cats in here hunting mice on the tiers. Sometimes birds come inside from outside and they are flying around inside PICC. Sometimes they poop and it might even get in our food.

11. The emergency alert buttons on the walls do not work, and no guards will come. Someone on my block stabbed his cell mate because he requested a cell change, but the guard did not grant it. It seemed he was injured really badly. The violence in here is bad.

12. I haven't had any access to any batteries, so I can't listen to a Walkman or listen to the radio.

13. Guards will turn to pepper spray first whenever there is a fight. In March 2020, a CO emptied a can of pepper spray into my eyes and at that time I was trying to defend myself against somebody trying to stab me. I was sent to the hole for being attacked. There was a hearing, but it was not fair and I didn't have an opportunity to speak on my behalf. I was given 15 days punitive segregation and about 4 months administrative segregation.

14. I find that whenever I put in a grievance, I get retaliated against by not being let out of my cell, or my commissary will get suspiciously lost, or staff will not give me all my medications. I never get responses to my grievances.

15. Guards have installed sliding bolt locks on my cell because people were popping out of cells. People were popping out to take showers and use phones or get hot water to cook food. But, regardless, everyone is being punished for the behavior of just a few people. These sliding locks are a fire hazard. People in here set fires all the time. We are considered the lowest of the low people on the face of the earth. I know that nobody is going to come around here manually and open these locks if there is a fire. They will let us die, or even sometimes it seems they hope we kill each other. I am really worried about what will happen if there is a fire.

Pursuant to 28 U.S.C. § 1746, I, Tyri Washington, declare under penalty of perjury that the foregoing is true and correct. Executed this 4th day of November, 2021.

A handwritten signature in black ink that reads "Tyri Washington". The signature is written in a cursive style and is positioned above a horizontal line.

Tyri Washington

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THOMAS REMICK, <i>et al.</i>	:	
and all others similarly situated,	:	
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Plaintiffs-Petitioners,	:	
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v.	:	
	:	
CITY OF PHILADELPHIA; and	:	
BLANCHE CARNEY, in her official	:	
capacity as Commissioner of Prisons,	:	
	:	
Defendants-Respondents.	:	

DECLARATION OF RUSSELL WATSON

I, Russell Watson hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 36 years old and currently incarcerated at Curran-Fromhold Correctional Facility (CFCF).
2. I am currently housed on Unit B2P4.
3. When I entered PDP custody on August 25, 2021, I was held in a receiving room at CFCF for five or six days.
4. During that time, I was forced to sleep on the floor and on benches in a room with at least 10 other people.
5. The space was so small and crowded that we had to climb over each other to get to the toilet.

6. A Correctional Officer (CO) told me that the documentation was altered so that records showed that I had already been moved to the intake quarantine unit when I was actually still in the receiving room.

7. I have been moved between facilities several times due to exposure to COVID-19.

8. In late September 2021, I was brought to DC because I was told that the staff member who had been testing people for COVID-19 prior to court dates had tested positive for COVID-19 herself.

9. I missed my court date and was held at DC for about ten days. I was then taken back to CFCF Unit B2P4 on September 30, 2021.

10. After a week on Unit B2P4, I was tested again for COVID-19 and was told I tested positive.

11. I am very concerned that I had COVID-19 during the week that I was back on B2P4 and that I could have passed the virus along to my cellmate, who got very sick during that time.

12. I was housed at DC on Unit A from October 6-13, 2021.

13. I was very confused as to the classification of Unit A because the unit housed people who had COVID-19, people who were exposed to COVID-19 but tested negative, and people who were on segregation status.

14. We were often let out of our cells at the same times so people were interacting with each other regardless of their COVID-19 status.

15. Although I had all the symptoms of COVID-19, I was not given anything to treat my symptoms. I was not even given over-the-counter medication for pain relief or fever reduction.

16. When I was housed on DC A Unit, I was only able to come out of my cell for about 20 minutes per day. Some days we did not come out at all.

17. At CFCF on Unit B2P4, we do not come out consistently for three hours every day. We typically come out for about two hours in the morning, but sometimes in the afternoon we do not come out again or if we do it might only be for about 30 minutes.

18. When we do not come out, we are told it is because of a shortage of staff.

19. Mail delivery is backed up and inconsistent. I ordered some outside publications and, according to the notification my family received from the organization I ordered them from, they were sitting in the jail for over a week before I received them.

20. Mailboxes are located on the unit, so we can see when the mail staff comes to collect and deliver mail, and they do not come every day.

21. Staff do not monitor who uses the tablets or make sure that people sign up or take turns. As a result, there are often fights over tablets and phones.

22. Staff do not intervene when people are fighting. They just sit in the bubble and watch people hurt each other until they decide to get up and spray everyone involved with pepper spray.

23. We do not receive hygiene supplies regularly.

24. We have to beg for soap or masks to receive them.

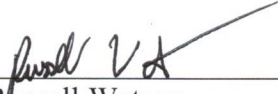
25. Because I have been shifted between facilities, I have not been able to order commissary. Instead, I have to rely on staff to provide necessary supplies like soap and cleaning supplies. I have not been receiving them.

26. At DC, there were no cleaning supplies available, which was particularly concerning given that we were housed there for exposure to COVID-19.

27. DC was so dirty that I had to clean rat feces off of the bed, floor, and walls. I had to use toilet water to mop the floor because I had no other options.

28. I have had no access to the law library in either DC or CFCF. It seems like the law library is closed.

Pursuant to 28 U.S.C. § 1746, I, Russell Watson, declare under penalty of perjury that the foregoing is true and correct. Executed this 14th day of October, 2021.



Russell Watson

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THOMAS REMICK, <i>et al.</i>	:	
and all others similarly situated,	:	
	:	CIVIL ACTION NO. 20-1959
Plaintiffs-Petitioners,	:	
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	:	
CITY OF PHILADELPHIA; and	:	
BLANCHE CARNEY, in her official	:	
capacity as Commissioner of Prisons,	:	
	:	
Defendants-Respondents.	:	

DECLARATION OF SHERDINA WILLIAMS

I, Sherdina Williams, hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am currently housed at Mod 3, on Unit A.
2. On Unit A, we are not let out of our cells every day.
3. We have gone multiple days at a time without coming out of our cells at all. We rarely come out on the weekends.
4. When we do not receive recreation time, we cannot shower or use the phones to call our loved ones or our attorneys.
5. Correctional officers (COs) tell us that the lack of out-of-cell time is due to staff shortages.
6. On Wednesday, September 15, 2021, in response to several women on the unit asking to come out of our cells, CO Harris told us they do not have to let us out because we are too needy.

7. I am not receiving all the necessary medical care that I need.

8. When I was previously incarcerated in PDP custody in 2020, I was taken to Jefferson Hospital to see a cardiologist because a PDP nurse noticed that my heartrate was low during a routine vitals check. The cardiologist at Jefferson Hospital confirmed that my heart rate was very low. The doctor placed a heart monitor on me and told me that I needed a stress test and may need heart surgery. I was never taken for further tests or surgery.

9. Now that I am in PDP custody again, I have been having very concerning symptoms including a fast heart rate at night, loss of consciousness, and shortness of breath when I lie down.

10. I have put in 16 sick calls in the previous three months about my heart concerns. I have not yet seen a doctor.

11. I asked a nurse who passes out medication why I have not yet seen a medical provider, and he told me that the medical providers do not want to come to work so there is a backlog of sick calls.

12. Around two weeks ago, a new medication showed up in my medication cup. I have not taken it because no one has told me what the medication is for or talked to me about it. I asked the medication nurse what it was and he said maybe it is for my heart. I asked how I could be prescribed medication if I have not seen a doctor and he told me to file a grievance about it.

13. I have filed 9 grievances in the past few months and PDP staff have not responded to any of them.

14. We are not able to clean Unit A because we do not receive cleaning supplies and we are not let out of our cells to clean.

15. There are no cleaning supplies available except when staff members buy cleaning supplies themselves and allow us to use them.

16. When a Major does her weekly tour, COs fill up another unit's spray bottle and leave it on the unit so it looks like there are cleaning supplies on this unit. We are not permitted to use this spray bottle to clean our cells.

17. We put sheets over the tables to eat because the metal tables are very rusted.

18. I am a block worker and responsible for passing out food. Sometimes I do not have gloves to wear while I am working.

19. We are only allowed to do laundry once per week. We have not had sheets and uniform exchange for several weeks. Even when they do have uniforms to exchange, they are only available in very large sizes that do not fit most women on the unit.

20. We have not received new face masks in about two months. Last week, we were told to sign a paper saying that we received new masks, but we never actually got them.

21. Staff have not been passing out our legal mail. The last piece of legal mail that I received was given to me by another incarcerated person because she noticed that there were letters just sitting on the COs desk and passed them out herself.

22. I have not had the opportunity to go to the law library since I have been on Unit A. I am trying to prepare a release plan so I wrote a three-page letter to the Major the last time she did a tour requesting to go to the law library or alternatively be given paperwork to fill out. I have not received a response.

23. I was put in disciplinary segregation in February 2021, but I was not given a hearing. I was told there were no hearings taking place because of COVID-19.

Pursuant to 28 U.S.C. § 1746, I, Sherdina Williams, declare under penalty of perjury that the foregoing is true and correct. Executed this 20th day of September, 2021.


Sherdina Williams

EXHIBIT B

Facility	Housing Unit	8/30/2021	8/31/2021	9/1/2021	9/2/2021	9/3/2021	9/4/2021	9/5/2021	9/6/2021	9/7/2021	9/8/2021	9/9/2021	9/10/2021	9/11/2021	9/12/2021	9/13/2021	9/14/2021	9/15/2021	9/16/2021	9/17/2021	9/18/2021	9/19/2021	9/20/2021	9/21/2021
CFCF	A1P1																							
	A1P2																							
	A2P1																							
	A2P2																							
	A2P3																							
	A2P4																							
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PICC	A																							
	B																							
	C																							
	D																							
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	G																							
	H																							

Red = Units Not in Compliance with Court Ordered 3 Hour Out-of-Cell Time Requirement, as per the Deputy Wardens' Certifications
 N.B. -- Dorm units and segregation units are excluded from this summary.

Facility	Housing Unit	9/22/2021	9/23/2021	9/24/2021	9/25/2021	9/26/2021	9/27/2021	9/28/2021	9/29/2021	9/30/2021	10/1/2021	10/2/2021	10/3/2021	10/4/2021	10/5/2021	10/6/2021	10/7/2021	10/8/2021	10/9/2021	10/10/2021	10/11/2021	10/12/2021	10/13/2021	10/14/2021	10/15/2021		
CFCF	A1P1																										
	A1P2																										
	A2P1																										
	A2P2																										
	A2P3																										
	A2P4																										
	B1P1																										
	C1P1																										
	C1P2																										
	C1P3																										
	C1P4																										
	C2P1																										
	C2P2																										
	C2P3																										
	C2P4																										
	D1P1																										
	D1P2																										
	D1P3																										
	D1P4																										
	D2P1																										
D2P2																											
D2P3																											
D2P4																											
PICC	A																										
	B																										
	C																										
	D																										
	G1																										
	H1																										
	K																										
	F2	closed	closed	closed	closed	closed	closed	closed	closed	closed	closed	closed	closed	closed													
G2																											
H2																											
RCF	D																										
	E																										
	F																										
	G																										
H																											

Red = Units Not in Compliance with Court Ordered 3 Hour Out-of-Cell Time Requirement, as per the Deputy Wardens' Certifications
 N.B. - Dorm units and segregation units are excluded from this summary.

Facility	Housing Unit	10/16/2021	10/17/2021	10/18/2021	10/19/2021	10/20/2021	10/21/2021	10/22/2021	10/23/2021	10/24/2021	10/25/2021	10/26/2021	10/27/2021	10/28/2021	10/29/2021	10/30/2021	10/31/2021	11/1/2021	11/2/2021	11/3/2021	11/4/2021	11/5/2021	11/6/2021	11/7/2021
CFCF	A1P1																							
	A1P2																							
	A2P1																							
	A2P2																							
	A2P3																							
	A2P4																							
	B1P1																							
	C1P1																							
	C1P2																							
	C1P3																							
	C1P4																							
	C2P1																							
	C2P2																							
	C2P3																							
	C2P4																							
	D1P1																							
	D1P2																							
	D1P3																							
	D1P4																							
	D2P1																							
D2P2																								
D2P3																								
D2P4																								
PICC	A																							
	B																							
	C																							
	D																							
	G1																							
	H1																							
	K																							
	F2																							
	G2																							
	H2																							
RCF	D																							
	E																							
	F																							
	G																							
H																								

Red = Units Not in Compliance with Court Ordered 3 Hour Out-of-Cell Time Requirement, as per the Deputy Wardens' Certifications
 N.B. -- Dorm units and segregation units are excluded from this summary.