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Charlotte Wells, on behalf of themselves and all others
similarly situated*

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UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

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

Plaintiffs,

v.

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

Defendants.

No. CV 12-00601-PHX-ROS

**DECLARATION OF
CORENE T. KENDRICK**

1 I, Corene T. Kendrick, declare:

2 1. I am an attorney licensed to practice before the courts of the State of
3 California, and admitted to this Court *pro hac vice*. I am a staff attorney at the Prison Law
4 Office (“PLO”), and an attorney of record to the plaintiff class in this litigation.

5 2. On February 19-20, 2020, I participated in a monitoring tour of ASPC-
6 Tucson, which has an infirmary. On February 19, 2020, I toured the infirmary and spoke
7 with the site medical director, who stated that there were two negative pressure rooms in
8 the infirmary, and showed the rooms to us. Both rooms had patients living in them.

9 3. On July 31-August 1, 2019, I participated in a monitoring tour of ASPC-
10 Lewis, which has a small 13-bed infirmary. On July 31, 2019, I toured Lewis’ infirmary.
11 I did not observe any negative pressure rooms, and the health care staff working in the
12 infirmary confirmed that there are none at Lewis.

13 4. On April 2-4, 2019, I participated in a monitoring tour of ASPC-Perryville.
14 At the time of our tour, the area previously used as an infirmary was being converted into
15 an inpatient mental health facility. The infirmary services had been moved to Lumley
16 Unit, where the patients were in an open dorm setting. There were three isolation/private
17 rooms, that were occupied, and nursing staff confirmed that they were not negative
18 pressure rooms.

19 5. To my knowledge, ADC does not have any infirmary / inpatient medical
20 beds at any facilities other than Florence, Lewis, Perryville, and Tucson prisons.

21 **Exhibits**

22 6. Attached as **Exhibit 1** is a true and correct copy of a document produced by
23 Defendants’ counsel on March 19, 2020, that they Bates-stamped as ADCM1607083, in
24 response to a recurrent document request for all agenda and meeting minutes for the
25 monthly “Director’s meeting” between the ADC Director and the leadership of the health
26 care contractor. This document is dated February 7, 2020, and lists three agenda items;
27 none of which relate to COVID-19.
28

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CERTIFICATE OF SERVICE

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

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