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Jeremy Smith, Robert Gamez, Maryanne Chisholm,  
Desiree Licci, Joseph Hefner, Joshua Polson, and  
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  
MAYA S. ABELA**

1 I, Maya S. Abela, declare:

2 1. I am an attorney licensed to practice before the courts of the State of Arizona.  
3 I am a supervisory attorney at the Arizona Center for Disability Law (“ACDL”), and an  
4 attorney of record for the plaintiff ACDL in this litigation.

5 2. As noted in my previous declaration (Doc. 3524 at 2 ¶ 6), I visited ASPC-  
6 Florence South Unit on March 11, 2020. I directed escort staff to take photographs  
7 documenting the lack of soap and soap dispensers in a bathroom on South Unit. Attached  
8 as **Exhibit 1** hereto are true and correct copies of the photographs that Defendants Bates-  
9 stamped ADCM1603603-04 and produced to Plaintiffs’ counsel on March 18, 2020.

10 3. As noted in my previous declaration (Doc. 3524 at 3 ¶ 13), I visited the D and  
11 E yards of North Unit on March 12, 2020. I directed escort staff to take photographs  
12 documenting the leaking roofs, including plastic sheeting rigged up in an attempt to stop  
13 leaks, and conditions in the North Unit D and E yard tents. Attached as **Exhibit 2** hereto  
14 are true and correct copies of the photographs that Defendants Bates-stamped  
15 ADCM1603621-25, ADCM1603635-36, ADCM1603641-42, ADCM1603650-55 and  
16 produced to Plaintiffs’ counsel on March 18, 2020.

17 4. As noted in my previous declaration (Doc. 3524 at 4 ¶ 14), I visited the  
18 bathroom facilities on the D yard of North Unit. I directed escort staff to take photographs  
19 documenting the general conditions of these facilities, including the urinals, toilets, sinks,  
20 and showers, and the lack of soap and soap dispensers in the bathroom. Attached as **Exhibit**  
21 **3** hereto are true and correct copies of the photographs that Defendants Bates-stamped  
22 ADCM1603626-34, and produced to Plaintiffs’ counsel on March 18, 2020.

23 5. As noted in my previous declaration (Doc. 3524 at 4 ¶ 14), I visited the  
24 bathroom facilities on the E yard of North Unit. I directed escort staff to take photographs  
25 documenting the general conditions of the facilities, including the urinals, toilets, sinks, and  
26 showers, and the lack of soap and soap dispensers in the bathroom. Attached as **Exhibit 4**  
27 hereto are true and correct copies of the photographs that Defendants Bates-stamped  
28

1 ADCM1603620, ADCM1603643, ADCM1603644-49 and produced to Plaintiffs' counsel  
2 on March 18, 2020.

3 I declare under penalty of perjury that the foregoing is true and correct.

4 Executed March 20, 2020, in Tucson, Arizona.

5  
6 /s/ Maya Abela  
7 Maya Abela  
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2 ADDITIONAL COUNSEL OF  
RECORD:

By: s/ Corene T. Kendrick

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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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