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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
RITA K. LOMIO**

1 I, Rita K. Lomio, 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, and an attorney of record to the plaintiff class in this litigation.

5 2. As noted in my previous declaration (Doc. 3522 at 2 ¶ 5), on March 11,
6 2020, a class member housed on South Unit showed me his commissary list. I directed
7 escort staff to take photographs of the page listing the types and prices of available soap.
8 Attached as **Exhibit 1** hereto are true and correct copies of the photographs that
9 Defendants Bates-stamped ADCM1603575-ADCM1603576 and produced to Plaintiffs'
10 counsel on March 18, 2020.

11 3. As noted in my previous declaration (Doc. 3522 at 2-3 ¶ 6), South Unit has
12 dorm-style housing. I directed escort staff to take a photograph of one of those dorms on
13 March 11, 2020. Attached as **Exhibit 2** hereto is a true and correct copy of the
14 photograph that Defendants Bates-stamped ADCM1603605 and produced to Plaintiffs'
15 counsel on March 18, 2020.

16 4. As noted in my previous declaration (Doc. 3522 at 3 ¶ 10), on March 11,
17 2020, I visited the medical clinic on South Unit. I directed escort staff to take
18 photographs of material posted on the outside of the clinic. Attached as **Exhibit 3** hereto
19 are true and correct copies of the photographs that Defendants Bates-stamped
20 ADCM1603569-ADCM1603570 and ADCM1603573-ADCM1603574 and produced to
21 Plaintiffs' counsel on March 18, 2020.

22 5. As noted in my previous declaration (Doc. 3522 at 4 ¶ 12), on March 12,
23 2020, I visited the medical clinic on North Unit. I directed escort staff to take a
24 photograph of the hand sanitizer dispenser marked "OUT!" Attached as **Exhibit 4** hereto
25 is a true and correct copy of the photograph that Defendants Bates-stamped
26 ADCM1603613 and produced to Plaintiffs' counsel on March 18, 2020.

27 6. As noted in my previous declaration (Doc. 3522 at 4 ¶ 13), on March 12,
28 2020, I directed escort staff to take photographs of the signs on two restrooms in the North

1 Unit medical clinic pertaining to access by incarcerated people. Attached as **Exhibit 5**
2 hereto is a true and correct copy of the photograph that Defendants Bates-stamped
3 ADCM1603615 and produced to Plaintiffs' counsel on March 18, 2020.

4 7. As noted in my previous declaration (Doc. 3522 at 4 ¶ 13), on March 12,
5 2020, I directed escort staff to take a photograph of COVID-19 information posted in the
6 hallway of the medical clinic on North Unit. Attached as **Exhibit 6** hereto is a true and
7 correct copy of the photograph that Defendants Bates-stamped ADCM1603616 and
8 produced to Plaintiffs' counsel on March 18, 2020.

9
10 I declare under penalty of perjury that the foregoing is true and correct.

11 Executed on March 20, 2020, in Berkeley, California.

12 s/ Rita K. Lomio

13 Rita K. Lomio
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3 RECORD:
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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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s/ C. Kendrick