

# EXHIBIT 3



8. The COVID-19 outbreak has negatively impacted me in two significant ways. First, it has made my economic situation more uncertain. Second, it has further reduced my options for safe and affordable transportation. Both impacts are worse than they otherwise would be because my driver's license is suspended due to traffic tickets I still cannot afford to pay. As a result, I cannot legally drive.

### **My Health Situation**

9. I have been experiencing a cough and shortness of breath for about 3 weeks. These symptoms have gotten worse in the past week.
10. At first, I thought these were just symptoms of my bronchitis, asthma, or seasonal allergies. I have chronic bronchitis, which is a lung disease that causes me to cough and sometimes suffer from shortness of breath.
11. However, I recently became concerned that I may have contracted COVID-19.
12. Last Monday, March 30, I consulted with a doctor over the phone, who prescribed me medicine to help with bronchitis symptoms. But this medication has not helped my symptoms.
13. The day after I spoke to the doctor over the phone, my partner drove me to the doctor's office. I received a referral to get a chest x-ray. However, I was not able to have the x-ray done that day because my doctor thought my symptoms were probably from bronchitis or allergies. The medical professionals did not test me for COVID-19.
14. On Monday, April 6, I began feeling disoriented and had body aches. I could not perform tasks like washing dishes without having to lay down. At one point, I was so disoriented I had to lie on the floor for at least an hour before I got my bearings. I was exhausted.

15. The next day, on April 7, I still felt unwell. I called my partner, who left his job early to drive me to get a chest x-ray. The doctor told me to come back the next day for additional bloodwork and tests.
16. My partner drove me to the doctor again on April 8. I received additional bloodwork. However, I did not get a COVID-19 test because my doctor said that the chest x-ray did not show a high likelihood of the disease.
17. However, I am still scared because I do not know for sure what I have. I have never had an allergic reaction or bronchitis this bad before.
18. Even if I do not have COVID-19 now, I am still concerned about the possibility of contracting it because I have respiratory issues already. I know that the virus is more dangerous for people who already have conditions like chronic bronchitis. I fear that not having a driver's license could make it more difficult for me to seek medical assistance in case of an emergency.

**The Impact of COVID-19 on My Ability to Travel to Look for Work,  
Access Health Care, and Meet Basic Needs**

19. Since filing this lawsuit in October 2019, my financial situation has worsened.
20. My employment at A Second Chance Resource Center (ASCRC) ended in December, and I no longer have that income to support myself.
21. While I still have a part-time job cleaning a local church once per week, I do not earn enough money there to support myself.
22. My supervisor recently informed me that the church is closed to the public until further notice.
23. Although I am still being paid by the church as if it were open, for now, I do not know how long that will continue.

24. Since the COVID-19 outbreak began, it has been harder for me to safely travel to access health care, meet my basic needs, and look for work when I feel healthy. This is especially true due to the ongoing suspension of my driver's license for failure to pay traffic tickets.
25. I have not taken public transportation since the outbreak because it is nearly impossible to follow social distancing guidance on the bus.
26. Since the outbreak, I have exclusively relied on rides from my partner to limit my exposure to COVID-19. I have stopped taking rides from other people because each person is a potential new risk of exposure to COVID-19.
27. My partner cannot always provide me transportation when I need it.
28. My inability to engage in social distancing on public transportation and when getting rides has made it even more difficult for me to go to my part-time job when I need to. It also makes looking for new work more difficult. When I feel better, I will need to continue looking for work.
29. Because of the suspension of my driver's license, I would not be able to drive myself or my partner to the hospital in case of an emergency.
30. I know that hundreds, if not thousands, of people in South Carolina are in a similar situation as me because their driver's licenses are suspended for unpaid traffic tickets. This makes it harder for all of us to travel for health care, meet basic needs, look for jobs, and travel to work at a time when we need to be socially distancing to keep ourselves safe and healthy.
31. It is important to me to help everyone who is in a similar situation as me.

32. The harms that others and I experience from the suspension of our driver's licenses for unpaid traffic tickets are even worse during this COVID-19 health crisis.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 8th day of April, 2020.

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Janice Carter

**Reader's Declaration**

I, Robert Hunter, certify under penalty of perjury under the laws of the United States that I have read the attached declaration to plaintiff Janice Carter, and she has indicated to me that its contents are true and correct.

s/Robert Hunter  
Robert Hunter, NY Reg. No. 5672647

Dated this 8th day of April, 2020.