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8 *Desiree Licci, Joseph Hefner, Joshua Polson, and*  
*Charlotte Wells, on behalf of themselves and all others*  
*similarly situated*

9 **[ADDITIONAL COUNSEL LISTED ON**  
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15  
16 UNITED STATES DISTRICT COURT  
17 DISTRICT OF ARIZONA

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

22 v.

23 David Shinn, Director, Arizona Department of  
Corrections; and Richard Pratt, Division Director,  
24 Division of Health Services Contract Monitoring  
Bureau, Arizona Department of Corrections, in their  
25 official capacities,  
26 Defendants.

No. CV 12-00601-PHX-ROS

**DECLARATION OF**  
**RITA K. LOMIO**

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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.

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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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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