

1 XAVIER BECERRA
Attorney General of California
2 DAMON G. MCCLAIN
Supervising Deputy Attorney General
3 NASSTARAN RUHPARWAR
Deputy Attorney General
4 State Bar No. 263293
455 Golden Gate Avenue, Suite 11000
5 San Francisco, CA 94102-7004
Telephone: (415) 510-4435
6 Fax: (415) 703-5843
E-mail: Nasstaran.Ruhparwar@doj.ca.gov
7 *Attorneys for Defendants*

HANSON BRIDGETT LLP
PAUL B. MELLO - 179755
SAMANTHA D. WOLFF - 240280
KAYLEN KADOTANI - 294114
425 Market Street, 26th Floor
San Francisco, CA 94105
Telephone: (415) 777-3200
Facsimile: (415) 541-9366
pmello@hansonbridgett.com

8
9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA
11 OAKLAND DIVISION

12
13 **MARCIANO PLATA, et al.,**

14 Plaintiffs,

15 v.

16 **EDMUND G. BROWN, et al.,**

17 Defendants.
18

Case No. 01-cv-01351-JST

**DEFENDANTS' JUNE 18, 2020
SUBMISSION IN RESPONSE TO
COURT'S REQUEST FOR COVID-19-
RELATED EDUCATION MATERIALS**

19
20 Per the Court's request from the June 9, 2020 case management conference, Defendants
21 hereby submit copies of various COVID-19-related education materials that have been made
22 available to inmates and staff working at CDCR's institutions.

23 On June 11, 2020, CDCR's Division of Adult Institutions (DAI) sent a request for "[c]opies
24 of all educational material regarding COVID-19 that has been sent to or posted for staff or
25 inmates within the last two weeks. This includes posters or memos that were issued more than
26 two weeks ago, but that are still posted. The purpose of this request is to allow the Court to
27 review messaging that is being provided to staff and inmates by headquarters and institution
28 leadership" to all of CDCR's institutions. Attached as Exhibit A are true and correct copies of

1 posters and flyers that were received in response to the foregoing request. Attached as Exhibit B
2 are true and correct copies of memoranda and emails that were provided by CDCR's institutions.
3 For safety reasons, any identifying information (such as first names or phone extensions) have
4 been redacted. In addition, irrelevant information was redacted from one of the emails. Attached
5 as Exhibit C are two lists of COVID-19 educational videos with links to where the videos can be
6 found online on YouTube or Vimeo. All the videos listed in the first document titled "CCHCS
7 Videos Playing on DRP-TV Wellness Channel (June 9, 2020)" are currently being played on a
8 daily basis on DRP-TV and are part of a 90-minute COVID-19 block that is repeated 6 times a
9 day, 7 days a week. The videos are playing on the Health and Wellness Channel, which is
10 available in institutions with DRP-TV. This channel is available on personal TVs and dayroom
11 TVs. The institutions also have two local channels and can choose to expand the content to those
12 forums. Lastly, attached as Exhibit D is a manual filing notice per which Defendants submitted
13 three videos DAI received from Avenal State Prison (ASP). These videos are playing on a loop
14 on one of the local TV stations.

15 Defendants note that, in addition to the above materials, CDCR's institutions and DAI
16 provided numerous additional memoranda and correspondence from DAI to CDCR's institutions,
17 or from Wardens to staff, starting from mid-March until early June. Defendants do not believe
18 these documents fall into the category of "educational materials." Instead, they would be more
19 fairly characterized as directives concerning symptom screening, social distancing, personal
20 hygiene, personal protective equipment, food distribution, sanitizing common areas, program
21 modification, inmate movements, and treatment protocols. CCHCS also issued similar
22 memoranda to statewide medical officers, supervisors, and executive staff. Because these
23 documents are not "educational materials," Defendants did not include them in this filing. But
24 Defendants would be happy to provide them to the Court if the Court would like to see them.

25 //

26 //

27 //

28 //

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: June 18, 2020

Respectfully submitted,

XAVIER BECERRA
Attorney General of California
DAMON G. MCCLAIN
Supervising Deputy Attorney General

/s/ Nasstaran Ruhparwar
NASSTARAN RUHPARWAR
Deputy Attorney General
Attorneys for Defendants

CA2001CS0001
42234536.docx