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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **OAKLAND DIVISION**

13 MARCIANO PLATA, et al.,
14
15 Plaintiffs,
16 v.
17 GAVIN NEWSOM, et al.,
18 Defendants.

CASE NO. 01-1351 JST

**DECLARATION OF JENNIFER OSBORN
IN SUPPORT OF DEFENDANTS'
RESPNOSE TO ORDER TO SHOW
CAUSE RE: BASELINE STAFF TESTING
FOR COVID-19**

Judge: Hon. Jon S. Tigar

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20 I, Jennifer Osborn, declare:

21 1. I am employed by the California Department of Corrections and Rehabilitation
22 (CDCR) as the Director of the Division of Administrative Services. I have held this position since
23 since December 2018. I have personal knowledge of the matters set forth in this declaration and
24 could and would competently testify to them. I submit this declaration in support of Defendants'
25 response to the Court's order to show cause regarding staff testing.

26 2. The Division of Administrative Services has been responsible for obtaining COVID-19
27 testing services for staff at CDCR's prisons. Accordingly, the Division has kept track of the staff
28 testing it has arranged and also conducts contact tracing based on testing results.

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3. The following summarizes the staff testing that CDCR has conducted since May:
- 1,603 staff tested at California Institution for Men in May and June;
 - 1,725 staff tested at San Quentin in mid-June and retesting of all San Quentin staff is scheduled to begin on June 30, 2020;
 - 1,949 staff tested at Corcoran in mid-June;
 - 286 staff tested at California Institution for Women on June 8, 2020;
 - 380 staff tested at California Men’s Colony on June 11, 2020;
 - 1,164 staff tested at Avenal State Prison in late May and serial testing at Avenal commenced on June 23, 2020;
 - 1,939 staff tested at California Medical Facility from June 24-30, 2020;
 - 2,959 staff tested at California Health Care Facility from June 24-30, 2020;
 - 1,018 staff tested at Central California Women’s Facility from June 26-30, 2020; and
 - 1,142 staff tested at California State Prison, Solano from June 26-30, 2020.

4. Voluntary staff testing commenced at California Correctional Center on June 18, 2020, mandatory testing of the remaining staff is scheduled to commence on July 1, 2020, and serial testing is scheduled begin on July 15, 2020. These plans were made before the Court issued the Order to Show Cause.

5. Testing of all staff at High Desert State Prison was already scheduled to commence on July 1, 2020, before the Court issued the Order to Show Cause.

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1 6. CDCR has decided to conduct baseline staff testing at all institutions. My staff and I
2 have been working to put contracts in place that will provide all needed staff testing. Yesterday, I
3 consulted with the contractor that will likely perform most of the baseline testing to inquire
4 whether it would be possible to complete baseline staff testing at all prisons by July 6, 2020. The
5 contractor advised that it would not be possible to complete the testing by July 6, but predicted
6 that the baseline testing could be completed at all prisons by July 16. Based on my experience
7 working with contractors to complete staff testing, I agree with this assessment. This is due to the
8 time required to complete the contracts with testing providers, the time required to schedule and
9 arrange for testing, additional administrative complications related to completing contracts during
10 the transition from one fiscal year to the next, and anticipated difficulties in making progress on
11 this project through the holiday weekend when many staff at the institutions are on vacation.

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I declare under penalty of perjury that the information in this declaration is true and correct to the best of my knowledge. Executed on this 30 day of June 2020 in Sacramento, California.

/s/ JENNIFER OSBORN
Jennifer Osborn