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

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

CASE NO. 01-1351 JST

**DECLARATION OF SAMANTHA  
WOLFF IN SUPPORT OF DEFENDANTS'  
OPPOSITION TO PLAINTIFFS'  
PROPOSED ORDER RE QUARANTINE  
AND ISOLATION**

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19 I, Samantha Wolff, declare as follows:

20 1. I am a partner with the law firm Hanson Bridgett LLP, counsel of record in this  
21 matter for Defendants Governor Newsom, et al. (Defendants). I have personal knowledge of the  
22 matters set forth in this declaration and could and would competently testify to them. All of the  
23 matters stated here are known to me personally, unless stated on information and belief; and with  
24 regard to those statements, I am informed and reasonably believe them to be true.

25 2. On July 8, 2020, the Receiver's office provided the parties with a draft plan  
26 regarding bed space for isolation and quarantine in response to the Court's July 7, 2020 order.  
27 (Dock. No. 3381.) The Receiver's office provided a revised plan on July 9, 2020.

28 3. The parties met with the Receiver on July 9 to discuss the revised draft document,

1 and during that meeting, the Receiver acknowledged the methodology document needed further  
2 revision and clarification. A revised draft was then provided to the parties on July 11. Another  
3 meet-and-confer discussion between the parties and the Receiver occurred on July 13, and the  
4 parties submitted their respective proposed orders to the Court on July 15. (Dock. No. 3391,  
5 3392.)

6 4. Following the July 16 Case Management Conference, and at this Court's urging,  
7 the parties met and conferred again on July 18. During that discussion, Defendants presented the  
8 general concept of their new proposal. The parties discussed the proposal in broad terms and  
9 Plaintiffs asked important questions about the development of this proposal and its possible  
10 implementation. Defendants indicated they would endeavor to provide additional information to  
11 Plaintiffs as it became available. Subsequently, on July 19, 2020 at 7:02 p.m., Defendants shared  
12 their revised proposed order with Plaintiffs' counsel and the Receiver.

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14 I declare under penalty of perjury that the foregoing is true and correct. Executed on July  
15 20, 2020 at Lafayette, California.

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Samantha D. Wolff

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