

DECLARATION OF EVANS TUTT

I, EVANS TUTT, declare as follows:

1. I am forty years old, competent to testify in this matter, and do so based on personal knowledge.
2. I am currently incarcerated at the Louisiana State Penitentiary (Angola) in Angola, Louisiana. I have been incarcerated there since February 2025, and my DOC number is 752631.
3. I was assigned to Farm Line 15 out of Camp C shortly after I arrived at Angola in February 2025.
4. I am a two-time cancer survivor. I still have imaging done regularly and need to see specialists to make sure the cancer does not come back. Angola prescribes me Eliquis and Zyrtec, which I go to pill call daily to take.
5. Angola has issued me a Heat Precaution Duty Status, but it does not take effect until May 1st.
6. On April 2, 2025, I was working hard on the Farm Line harvesting collard greens during the afternoon shift when I began to feel nauseated and dizzy. I had been sweating a lot but at that point my sweat dried up, and I was no longer sweating. I feared I was dehydrated, so I made a Self-Declared-Emergency to see a medical provider. I told the pusher that I had a Heat Precaution Duty Status. A medical provider never came to assess me.
7. Once the Farm Line was brought inside for the day, the line pusher informed his supervisor that medical never came out to see me. She replied that they have three hours to respond to a Self-Declared Emergency. I was not seen by any medical provider that day.

Signed Initials: ET

8. There was no tent or shade trailer out on the Farm Line that day. In the morning shift, they had no cups for us to drink water. In the afternoon shift, we ran out of water. They have not handed out sunscreen on the Farm Line since I've been at Angola.

9. I, Evans Tutt, declare that due to time constraints and technological inabilities given my incarceration, I could not personally sign this declaration. On this day, April 17, 2025, I spoke with my attorney Kara Crutcher via Zoom, and I authorized her to submit this declaration with my electronic signature because I was unable to provide a signature by the time of filing. I declare under the penalty of perjury that the foregoing is true and correct.

Dated this 17th day of April, 2025.

/s/ Evans Tutt
EVANS TUTT

DECLARATION OF KARA CRUTCHER

I, Kara Crutcher, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am a licensed attorney in good standing in Illinois.
2. I am enrolled as *pro hac vice* counsel in *Vote et al. v. Leblanc et al.*, Civil Action No. 3:23-cv-1304 (M.D. La.)
3. I represent the declarant as a putative class member in this case.
4. I signed the attached declaration on Evans Tutt's (DOC# 752631) behalf with his express consent.
5. Mr. Tutt is currently being held at Louisiana State Penitentiary. Counsel attempted to schedule an in-person visit for Friday, April 18, 2025 to get his ink signature but due to it being Good Friday, the prison was closed for legal visitation that day.
6. I spoke with Mr. Tutt over Zoom on April 17, 2025. Mr. Tutt has confirmed that I can submit this declaration to the court with his electronic signature, as reflected in his declaration.

I declare under penalty of perjury that the statements above are true and correct to the best of my knowledge and that this declaration was executed on April 17, 2025 in New Orleans, Louisiana.

Signature: _____

KARA CRUTCHER