

EXHIBIT 2

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7 *Counsel for Intervenors Monterey County*
8 *Weekly, First Amendment Coalition,*
9 *Patricia and Jennifer Ramirez, and*
10 *Yvette, Xavier, and Janel Pajas*

11 UNITED STATES DISTRICT COURT
12
13 NORTHERN DISTRICT OF CALIFORNIA

14 JESSE HERNANDEZ et al., on behalf of
15 themselves and all others similarly situated,

16 Plaintiffs,

17 v.

18 COUNTY OF MONTEREY; MONTEREY
19 COUNTY SHERIFF'S OFFICE; CALIFORNIA
20 FORENSIC MEDICAL GROUP,
21 INCORPORATED., a California corporation;
22 and DOES 1 to 20, inclusive,

23 Defendants.

Case No. CV 13 2354 BLF

**DECLARATION OF BRADLEY ZEVE
IN SUPPORT OF PROPOSED
INTERVENORS' MOTION TO
INTERVENE FOR THE LIMITED
PURPOSE OF UNSEALING COURT
RECORDS AND PROTECTING
ACCESS TO PRESUMPTIVELY OPEN
COURT PROCEEDINGS**

Hearing Date: November 16, 2023

Hearing Time: 9:00 am

Judge: Beth Labson Freeman

1 I, Bradley Zeve, declare:

2 1. I am the Founding Editor and CEO of Monterey County Weekly (“the Weekly”)
3 and Monterey County NOW, our daily newsletter. In addition to serving as CEO of the Weekly, I
4 served on the Board of Directors of the Association of Alternative Newsmedia for over a decade.

5 2. The Weekly was founded in 1988. Our mission is to inspire independent thinking
6 and conscious action, etc.

7 3. Since our early days, the Weekly has become a recognized leader for our
8 journalism and community service. While the reporting is almost entirely local, the Weekly was
9 the only newspaper in the national alternative newsmedia to send a reporter to the middle east to
10 cover both the Desert Storm war in the early 1990s and the Iraq war in early 2003. Our
11 commitment to in-depth coverage of news, arts and entertainment has been recognized nationwide
12 for presenting strong investigative reporting, diverse stories about local arts and entertainment, and
13 stories important to the people that live and work in the community.

14 4. The Weekly has received scores of California and national newspaper awards. In
15 2011, 2012 and 2019, 2021 and 2022 we were honored as one of the best weekly newspapers in
16 California by the California News Publishers' Association (First Place, General Excellence, large-
17 circulation weekly division in 2011, and finalist in 2012, 2019, 2021 and 2022). We have won
18 over 100 local, state and national awards, for public service journalism, ad/graphic design,
19 investigative reporting, overall writing, opinion writing, arts & entertainment reporting, and
20 photography, among other categories.

21 5. The Weekly has a demonstrated commitment to protecting free speech and
22 demanding government transparency. In 2015, we received the prestigious national First
23 Amendment Coalition Free Speech & Open Government Award in recognition of our years-long
24 effort to unearth public records, conduct interviews and produce an ambitious series outlining the
25 story behind the story of a sexual abuse case involving Father Edward Fitz-Henry and the
26 Monterey Diocese. Our reporters reviewed nearly 1,350 pages of documents and conducted
27 numerous sensitive interviews. The San Francisco law firm Bryan Cave waged a successful legal

1 battle on our behalf to unseal records. The Diocese appealed the trial court decision to unseal
2 records, and the trial court decision was upheld on appeal. The revelations from the unsealed court
3 documents and in-depth reporting resulted in an unusually transparent dissection of the case,
4 describing not only the details but also exploring the human aspects of the subjects.

5 6. The Weekly, like all professional news agencies in democratically governed
6 nations, relies on access to public records in its daily reporting. Most often, this does not result in
7 litigation. Weekly staff members routinely file requests with government agencies for public
8 records under the U.S. Freedom of Information Act and California Public Records Act. Staff
9 reviews court records and regularly attend court hearings. The records obtained are incorporated
10 into our journalism on a regular basis. In rare cases, we pursue litigation to obtain public records.

11 7. We have been covering local government, including operations at the Monterey
12 County Jail (“the Jail”), for more than 34 years. Our coverage of conditions at the Jail pre-dates
13 the settlement agreement in the Hernandez case, and we have been covering the case for at least
14 eight years. For example, we reported on the settlement agreement—including its provision that
15 the county and its medical contractor in the Jail pay for monitors to verify terms of the settlement
16 are being met—in a story titled “After two years of litigation, inmates settle with Monterey
17 County Jail over conditions and medical care,” published on May 11, 2015. On June 3, 2021, we
18 published a story titled “Attorneys for inmates who sued in a landmark case say Monterey County
19 Jail is slow to change” about ongoing concerns from attorneys representing the plaintiffs on
20 whether the county and its contractor were fulfilling their obligations in the Hernandez case. More
21 recently, on January 26, 2023, we published a story titled “People are still dying inside Monterey
22 County Jail” about ongoing concerns about compliance with the Hernandez settlement, even with
23 a newly elected sheriff taking leadership of the jail. In many other stories, we have covered topics
24 related to the Jail beyond the scope of the Hernandez settlement.

25 8. Covering stories about incarcerated people and conditions at the jail is important to
26 the Weekly because what happens inside this institution is in the public interest. The Monterey
27 County Sheriff’s Office is responsible for hundreds of incarcerated people in custody. That

1 includes ensuring basic health and safety needs are met. Beyond the scope of the Hernandez
2 settlement, the Sheriff's Office has faced challenges managing the Jail. California's prison
3 realignment has led to more people being incarcerated in local facilities, such as the Monterey
4 County Jail. How Monterey County's largest public safety agency addresses the welfare of its
5 incarcerated population—through factors such as staffing, design and construction of a facility,
6 and outside contractors offering training and academic courses—is newsworthy. These stories
7 matter not just to incarcerated people and their family members, but also to all Monterey County
8 taxpayers. Monterey County residents deserve to know how public officials are managing the Jail,
9 a significant budget expenditure for the county.

10 9. Through the course of our reporting, we are aware that, under the terms of the
11 Hernandez settlement, independent monitors inspect the Jail, conduct interviews, and review
12 records. It is the Weekly's understanding that the monitors create reports with their findings and
13 that those reports are, for the most part, not publicly accessible.

14 10. In instances when such reports are publicly accessible, they provide newsworthy
15 information that is in the public interest. For example, on October 21, 2021, we published a story
16 titled "The Monterey County Jail Covid outbreak draws scrutiny and calls for change." That news
17 story about a Covid outbreak in the Jail relied heavily on a report created by monitor Mike Brady
18 of Sabot Consulting.

19 11. On May 4, 2023, we published a story titled "Monterey County Jail is violating a
20 settlement over living conditions, lawyers claim." In that story, we noted that the recent court
21 filings are heavily redacted. As a result, our coverage of the litigation and our coverage of current
22 conditions at the Jail have been limited.

23 12. The Weekly intends to report on and attend the upcoming August 24, 2023,
24 settlement enforcement hearing. It is the Weekly's position that the court records, including the
25 independent monitor reports, should be unsealed before then to ensure our reporters, and any other
26 member of the press, have meaningful access to the proceedings.

27 13. We believe release of the information contained in the sealed records would fulfill

1 the County of Monterey’s obligation to be transparent about its operations—both its successes and
2 its shortcomings—in complying with the Hernandez settlement, and would enable community
3 leaders, government officials and the interested public to make the best decisions about the
4 facility’s operation.

5 I declare under penalty of perjury under the laws of the United States of America
6 that the foregoing is true and correct, and that this declaration is executed in Seaside, California this
7 20th day of July 2023.

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Bradley Zeve

EXHIBIT 3

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15 Plaintiffs,

16 v.

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18 COUNTY SHERIFF'S OFFICE; CALIFORNIA
19 FORENSIC MEDICAL GROUP,
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21 and DOES 1 to 20, inclusive,

22 Defendants.

Case No. CV 13 2354 BLF

**DECLARATION OF DAVID LOY IN
SUPPORT OF PROPOSED
INTERVENORS' MOTION TO
INTERVENE FOR THE LIMITED
PURPOSE OF UNSEALING COURT
RECORDS AND PROTECTING
ACCESS TO PUBLIC PROCEEDINGS**

Hearing Date: November 16, 2023
Hearing Time: 9:00 am

Judge: Beth Labson Freeman

1 I, David Loy, declare:

2 1. I am the Legal Director of the First Amendment Coalition (“FAC”). I have served in
3 my current position as Legal Director since February 2022.

4 2. FAC seeks to intervene in this case to protect its significant interests and those of its
5 members, as guaranteed by the First Amendment, in accessing records filed in this Court about the
6 operations of Monterey County Jail (“the Jail”), a public, government-funded institution.

7 3. I am an experienced free speech and open government litigator, having fought for
8 public disclosure and governmental transparency for over 20 years. As a litigator, I have defended
9 the First Amendment rights of reporters, photographers, bloggers, students, teachers, activists,
10 protestors, musicians, Marines, and more. Before joining FAC, I served as Legal Director of the
11 ACLU Foundation of San Diego & Imperial Counties for nearly 16 years.

12 4. Founded and established in 1988 as the California First Amendment Coalition, the
13 First Amendment Coalition (“FAC”) is a nonpartisan public interest nonprofit dedicated to
14 protecting and promoting a free press, freedom of expression, and the people’s right to know. FAC
15 advocates on behalf of the public and its members through litigation (cases involving issues of
16 censorship, rights of access to court and agency records, and access to proceedings of state and local
17 governments), education (providing free legal information on the First Amendment and freedom-
18 of-information issues), and public advocacy (op-eds and other articles, public speaking).

19 5. FAC believes that the broadest range of engaged and informed communities is
20 essential to the health of our democracy, and that the values expressed by the First Amendment
21 provide a blueprint for an inclusive, equitable society and a responsive, accountable government.
22 We believe that in order to realize the promise of the values underlying the First Amendment, we
23 must reach and include as broad a range of voices as possible to inform our policies, priorities and
24 programs. We recognize that there exist systemic inequities rooted in, among other things, race and
25 gender.

26 6. FAC believes journalists serve as government watchdogs, shining a light in dark
27 places despite frequent threats to their access to information, independence, and resources.

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1 7. Because information relating to incarceration, policing, and civil rights is of
2 significant public concern, FAC has a demonstrated commitment to ensuring law enforcement’s
3 exercise of its power is exposed to public scrutiny. For example, in 2022 FAC’s legal advocacy
4 resulted in the release of previously secret recordings of a police shooting of a San Diego woman
5 experiencing mental distress, and the Ventura County Sheriff’s Office’s disclosure of previously
6 secret records about officer use of force and misconduct. In May 2023, FAC and Knock LA, an
7 independent news organization, prevailed in a legal battle against the Los Angeles County Sheriff’s
8 Department (“LASD”) over the unsealing of search warrant materials. Through this victory, FAC
9 ensured the public could finally examine LASD’s stated rationale for seizing and searching the cell
10 phones and digital cameras protesters demonstrating against LASD deputies’ killing of cyclist Dijon
11 Kizzee on August 31, 2020, and journalists covering the protest.

12 8. FAC is committed to enforcing the First Amendment’s presumptive right of public
13 access to court records because it believes there can be no real accountability without transparency.
14 When needlessly sealed documents are revealed, the public learns how officials exercise their power
15 and can decide for itself whether such officials are acting appropriately.

16 9. FAC is aware that, under the terms of the settlement agreement in this case,
17 independent monitors inspect the jails, conduct interviews, review records, and create reports with
18 their findings. It is FAC’s understanding that many of these reports and related evidence were
19 recently filed conditionally under seal in support of Plaintiffs’ Motion to Enforce the Settlement
20 Agreement.

21 10. FAC believes public access to the monitor reports is essential to transparency and
22 accountability. People within and beyond Monterey County deserve to know how the Jail operates
23 and whether or to what extent the Jail is violating the civil rights of the people it incarcerates. People
24 deserve this knowledge not only because the Jail is a public institution run by their tax dollars, but
25 also (perhaps more importantly) because the Jail largely incarcerates low-wealth Black and brown
26 community members who are systemically marginalized and disenfranchised.

27 11. This Court may decide whether the Jail indeed continues to violate incarcerated

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1 people's rights, as Plaintiffs allege, but the public has a compelling interest in access to the
2 information that is before the Court, so the public can assess for itself the true state of conditions in
3 the Jail and hold elected officials accountable as the public sees fit.

4 I declare under penalty of perjury under the laws of the United States of America
5 that the foregoing is true and correct, and that this declaration is executed in San Diego, California
6 this 20th day of July 2023.

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David Loy

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EXHIBIT 4

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7 *Counsel for Intervenors Monterey County*
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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13 JESSE HERNANDEZ et al., on behalf of
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18 COUNTY SHERIFF'S OFFICE; CALIFORNIA
19 FORENSIC MEDICAL GROUP,
20 INCORPORATED., a California corporation;
21 and DOES 1 to 20, inclusive,

22 Defendants.

Case No. CV 13 2354 BLF

**DECLARATION OF PATRICIA
RAMIREZ IN SUPPORT OF
PROPOSED INTERVENORS' MOTION
TO INTERVENE FOR THE LIMITED
PURPOSE OF UNSEALING COURT
RECORDS AND PROTECTING
ACCESS TO PUBLIC PROCEEDINGS**

Hearing Date: November 16, 2023
Hearing Time: 9:00 am

Judge: Beth Labson Freeman

1 I, Patricia Ramirez, declare:

2 1. My name is Patricia Ramirez. I am a 33-year-old resident of Monterey County, where
3 I have lived all my life. I am a teaching aide and full-time student working on a Master's degree in
4 Early Childhood Education and Trauma Studies. My goal is to be an educator who can provide
5 support and resources for the children and families I work closely with.

6 2. I am the child of the late Rafael Ramirez Lara, who died inside the Monterey County
7 Jail on December 22, 2019. At the time my dad was arrested, he was experiencing mental health
8 issues. On the day of his arrest, I contacted the jail to let them know that my dad was not mentally
9 stable and that he needed support. I was reassured that my dad would get the help he needed and
10 that the jail had resources to help him. Based on what we were told, my family and I trusted that he
11 was safe there and that he would get help there until he was out, and then we could help him. On
12 Sunday, December 22, 2019, I got a call that my father passed away.

13 3. My family and I decided to pursue legal action against the County and Wellpath
14 because we needed answers. We knew jail had been involved in a lawsuit before for a similar issue
15 and yet it seemed that nothing had changed inside the jailor with the way Wellpath provided services
16 to the people in jail.

17 4. Taking legal action did bring some closure to us. We learned that our dad's death
18 could have been prevented if the jail and Wellpath staff had provided the medical and mental health
19 care attention dad needed. It is my understanding certain court records containing information about
20 conditions at the Jail were recently filed with the court but are not available to the public. It is my
21 understanding that those records include the reports of independent monitors who for many years
22 are supposed to have been checking to see if the Jail is making the necessary changes they agreed
23 they would make in the settlement agreement.

24 5. I believe Monterey County records should be public, because this type of
25 information can be used to better support people within the community and this includes people in
26 jail. There needs to be more resources for health and mental health for all people. Being in jail should
27 not be a reason to neglect the health and mental health of a person.

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1 6. I believe that making these records public is important because our communities
2 deserve to have a say in how our government, including the jail, works. We can't do that if we don't
3 know what the government is doing.

4 7. I believe that people with mental health illnesses should have resources available to
5 help them through their problems. Instead, many people, like my father, end up in Jail. One way our
6 communities can convince the government to give more resources to people with mental illnesses
7 is to show them that putting people in Jail is not the solution because people suffer there, or even
8 die.

9 8. Both Monterey County and Wellpath need to take better measures to provide support
10 to people that are in their care. Deaths like my dad's could have been prevented if Monterey County
11 and Wellpath made the changes they said they would under the settlement agreement. Monterey
12 County and Wellpath must be held accountable.

13 I declare under penalty of perjury under the laws of the United States of America
14 that the foregoing is true and correct, and that this declaration is executed in Gonzales,
15 California this 19th day of July 2023.

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18 Patricia Ramirez

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EXHIBIT 5

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7 *Counsel for Intervenors Monterey County*
8 *Weekly, First Amendment Coalition,*
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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

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18 COUNTY SHERIFF'S OFFICE; CALIFORNIA
19 FORENSIC MEDICAL GROUP,
20 INCORPORATED., a California corporation;
21 and DOES 1 to 20, inclusive,

22 Defendants.

Case No. CV 13 2354 BLF

**DECLARATION OF JENNIFER
RAMIREZ IN SUPPORT OF
PROPOSED INTERVENORS' MOTION
TO INTERVENE FOR THE LIMITED
PURPOSE OF UNSEALING COURT
RECORDS AND PROTECTING
ACCESS TO PUBLIC PROCEEDINGS**

Hearing Date: November 16, 2023
Hearing Time: 9:00 am

Judge: Beth Labson Freeman

1 I, Jennifer Ramirez, declare:

2 1. My name is Jennifer Ramirez. I am a 24-year-old resident of Gonzales, California. I
3 have spent my entire life in this close-knit community, witnessing both its strengths and its
4 challenges.

5 2. I am the child of the late Rafael Ramirez Lara, a man whose life was marked by
6 immense struggles. In his last couple of years, my father faced a difficult battle with mental health
7 issues and substance abuse. Unfortunately, during his time in jail, he did not receive the necessary
8 medical or mental health services that could have made a difference in his situation. It is
9 disheartening to reflect on the fact that the system failed my father when he needed support the most.

10 3. The circumstances surrounding my father's passing were deeply troubling. Despite
11 the existence of protocols and procedures designed to ensure the well-being of incarcerated people,
12 there were instances where jail staff overlooked these important guidelines. These oversights proved
13 to be devastating, as they ultimately contributed to my father's untimely death.

14 4. As a part of my family's response to the tragic circumstances surrounding my father's
15 death, my siblings and I made the difficult decision to take legal action against the Monterey County
16 Jail and Wellpath. We firmly believed that both entities failed my dad, and we wanted to hold them
17 accountable for their negligence. Our primary objective was to humanize my father and ensure that
18 the court understood the immense tragedy and pain caused by the jail and healthcare system's
19 shortcomings. We wanted to emphasize that, despite his mistakes, my father deserved to receive
20 proper care and supervision.

21 5. One crucial aspect of our case was highlighting the deteriorating mental state my
22 father experienced in the weeks leading up to his incarceration. We made sure the court was aware
23 of the extent of his instability and the numerous attempts we made to seek help from community
24 members and even within the jail system itself. It was crucial for the court to understand that my
25 father's mental health issues were not only significant but also known to various individuals who
26 could have intervened.

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1 6. It is my understanding that certain records containing information about the current
2 conditions in the jail are not available to the public, including the reports of the independent monitors
3 in this case. It deeply concerns me to learn that certain records containing crucial information about
4 the current conditions in the jail, including the reports of the independent monitors in this case, are
5 not accessible to the public. This lack of transparency represents a grave injustice, not only to the
6 affected families but also to the larger community.

7 7. When my family and I made the decision to file a lawsuit against Monterey County,
8 our primary motivation was to prevent other families from enduring the same tragedy we
9 experienced. We firmly believed that shedding light on the failures of the jail system was crucial to
10 initiating positive change. However, if reports and information about current conditions are withheld
11 from the public, it undermines those efforts and leaves us feeling dissatisfied and uncertain about
12 whether similar incidents will be prevented in the future.

13 8. The loss of lives, the pain endured by the families, and the hard journey towards
14 seeking justice should not be in vain. It is essential that the community is kept informed about the
15 conditions within the jail, including the findings of independent monitors.

16 9. In my own experience, access to records played a critical role in seeking justice for
17 my father's passing. The records we obtained from the Hernandez trial provided valuable
18 information that allowed us to navigate the legal process and hold those responsible accountable.
19 Without access to these records, our pursuit of justice would have been significantly hindered. The
20 integrity of the court system is called into question if the government is allowed to use litigation to
21 hide information. Denying public access to current conditions and reports could have a similar
22 effect, preventing other families from obtaining the information and evidence needed to seek justice
23 for their loved ones.

24 10. Moreover, making these records public is not only crucial for individual cases but
25 also has broader implications. The findings and insights contained within these records have the
26 potential to highlight systemic issues, identify patterns of negligence, and inform the necessary
27 reforms within the justice system. By keeping them sealed, we not only deny justice to those affected

1 but also impede progress toward a safe, more humane, and equitable system. The community has a
2 right to know about the conditions within the jail and the efforts being made to rectify any
3 shortcomings.

4 11. I believe it is imperative that these records are made public. By doing so, authorities
5 can demonstrate their commitment to transparency, accountability, and the well-being of the most
6 vulnerable among us. Furthermore, public access to these records enables families to seek justice,
7 promotes a safer environment, and contributes to the continuous improvement of our justice system.

8 I declare under penalty of perjury under the laws of the United States of America
9 that the foregoing is true and correct, and that this declaration is executed in Gonzales,
10 California this 19th day of July 2023.



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13 Jennifer Ramirez

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EXHIBIT 6

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Case No. CV 13 2354 BLF

**DECLARATION OF YVETTE PAJAS
IN SUPPORT OF PROPOSED
INTERVENORS' MOTION TO
INTERVENE FOR THE LIMITED
PURPOSE OF UNSEALING COURT
RECORDS AND PROTECTING
ACCESS TO PUBLIC PROCEEDINGS**

Hearing Date: November 16, 2023
Hearing Time: 9:00 am

Judge: Beth Labson Freeman

1 I, Yvette Pajas, declare:

2 1. I am 47 years old, and am the oldest child of Mark Pajas, Sr., who died in Monterey
3 County Jail on January 20, 2015, at age 56. I have two children, who are 9 and 18 years old.

4 2. My family and I were plaintiffs in a lawsuit against the County of Monterey and
5 California Forensic Medical Group based on our father's death at the Jail. We went through more
6 than three years of litigation. In 2019, at the end of a trial, a jury found the County of Monterey
7 had not provided adequate care to our father, resulting in his death.

8 3. We brought the lawsuit because I wanted to find out what had happened to my
9 father and because I wanted to stop anything similar from happening to anyone else at the Jail.
10 Without the lawsuit, we were not able to find out accurate information about my father's death and
11 what led to it. I believed that the County was hiding information that could explain what
12 happened to my father and that could help prevent other people from dying at the Jail. Through
13 the lawsuit, we were able to get this information and to show that my father's death could have
14 been prevented if the County had done what it was supposed to do under the law.

15 4. I am aware that there is a class action lawsuit and settlement that is supposed to
16 address the kinds of problems at the Jail that led to my father's death. We were told that was one
17 of the reasons we could not try to get the County to agree to change its policies as part of settling
18 our case. But I also follow the news about other deaths at Monterey County Jail and am
19 concerned that people continue to die unnecessary deaths at the Jail even after we won our lawsuit
20 in 2019.

21 5. Information about how the County is responding to the settlement and whether it is
22 implementing changes at the Jail is not public. I am concerned that, just like what happened with
23 my father, when this kind of information is not public, the County is not being held accountable
24 for making changes at the Jail to prevent more people from dying.

25 6. I think it is important for families like mine, who are deeply affected by what
26 happens to people incarcerated in the Jail, to be able to have access to this information so that we
27 can try to make sure more lives are not lost there.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration is executed in Stockton, California this 19th day of July 2023.

/s/ Yvette Pajas

Yvette Pajas

EXHIBIT 7

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Case No. CV 13 2354 BLF

**DECLARATION OF XAVIER PAJAS
IN SUPPORT OF PROPOSED
INTERVENORS' MOTION TO
INTERVENE FOR THE LIMITED
PURPOSE OF UNSEALING COURT
RECORDS AND PROTECTING
ACCESS TO PUBLIC PROCEEDINGS**

Hearing Date: November 16, 2023
Hearing Time: 9:00 am

Judge: Beth Labson Freeman

1 I, Xavier Pajas, declare:

2 1. I am 39 years old, and the father of a 13-year-old and a 4-month-old. My father,
3 Mark Pajas, Sr. died in Monterey County Jail on January 20, 2015. My youngest daughter will
4 never get to meet her grandfather.

5 2. My family and I were plaintiffs in a lawsuit against the County of Monterey and
6 California Forensic Medical Group based on our father's death at the Jail. We went through more
7 than three years of litigation. In 2019, after a trial, a jury found the County of Monterey had not
8 provided adequate care to our father, resulting in his death.

9 3. I have also been incarcerated in Monterey County Jail and have seen for myself
10 problems with how people are treated there.

11 4. I am concerned that the care at the Jail is not improving, and that people continue to
12 suffer there. I worry that more people continue not to get the right medical treatment and even die
13 at the Jail.

14 5. To me, it is really important that myself, my family, and other families, are able to
15 get information about what the Jail is doing and whether it is actually improving care like it is
16 supposed to. We need to be able to look out for and protect our community.

17 I declare under penalty of perjury under the laws of the United States of America
18 that the foregoing is true and correct, and that this declaration is executed in Greenfield,
19 California this 19th day of July 2023.

20

21

/s/ Xavier Pajas
Xavier Pajas

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EXHIBIT 8

1 Jaqueline Aranda Osorno [S.B. # 308084]
2 PUBLIC JUSTICE
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4 Washington, DC 20036
5 (202) 797-8600
6 jaosorno@publicjustice.net

7 *Counsel for Intervenors Monterey County*
8 *Weekly, First Amendment Coalition,*
9 *Patricia and Jennifer Ramirez, and*
10 *Yvette, Xavier, and Janel Pajas*

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13 JESSE HERNANDEZ et al., on behalf of
14 themselves and all others similarly situated,

15 Plaintiffs,

16 v.

17 COUNTY OF MONTEREY; MONTEREY
18 COUNTY SHERIFF'S OFFICE; CALIFORNIA
19 FORENSIC MEDICAL GROUP,
20 INCORPORATED., a California corporation;
21 and DOES 1 to 20, inclusive,

22 Defendants.

Case No. CV 13 2354 BLF

**DECLARATION OF JANEL PAJAS IN
SUPPORT OF PROPOSED
INTERVENORS' MOTION TO
INTERVENE FOR THE LIMITED
PURPOSE OF UNSEALING COURT
RECORDS AND PROTECTING
ACCESS TO PUBLIC PROCEEDINGS**

Hearing Date: November 16, 2023
Hearing Time: 9:00 am

Judge: Beth Labson Freeman

1 I, Janel Pajas, declare:

2 1. I am 46 years old and have four children. My father, Mark Pajas, Sr. died in
3 Monterey County Jail on January 20, 2015.

4 2. My family and I were plaintiffs in a lawsuit against the County of Monterey and
5 California Forensic Medical Group based on our father's death at the Jail. We went through three
6 years of litigation. In 2019, after a trial, a jury found the County of Monterey had not provided
7 adequate care to our father, resulting in his death.

8 3. My siblings and I were very close to my father, and my father was also a very
9 important person to his grandchildren, especially my son, Andrew. Andrew is now a police
10 officer in San Diego, California, and I believe his making it through school and the police
11 academy is because of my dad and what he told him about the importance of education.

12 4. Since my father's death in 2015, I have seen many news reports about more people
13 continuing to die at the Jail. Other families like mine are losing important people in their lives. I
14 am concerned that the Jail is not doing what it needs to do to stop people from being harmed and
15 even dying at the Jail.

16 5. When we brought our lawsuit, we understood that there was another case that had
17 been decided that was supposed to require the policies and procedures at the Jail to be fixed. But
18 information about what the Jail is doing in that case is not being reported in the news. I want to
19 make sure that other families won't suffer the same loss that mine has. Without the Jail having to
20 answer to the public, I am worried that nothing is changing.

21 I declare under penalty of perjury under the laws of the United States of America
22 that the foregoing is true and correct, and that this declaration is executed in Salinas, California
23 this 19th day of July 2023.

24

25 /s/ Janel Pajas
26 Janel Pajas

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