

**DECLARATION OF LORETTA JOHNSON IN SUPPORT OF MOTION FOR
PRELIMINARY INJUNCTION**

I, Loretta Johnson, do hereby declare, under penalty of perjury under the laws of the United States of America, that the following is true and correct:

1. I am a 63-year-old woman currently held in pre-trial detention at the Estrella Jail in Maricopa County. I have been detained in the Estrella Jail since April 2021.

2. I suffer from high blood pressure, arthritis, and chronic pain issues, including degenerative arthritis, sciatica, lower back pain, right knee pain caused by cartilage rubbing together, and right shoulder pain.

3. Despite my age and medical conditions, I do not remember being offered a vaccine for COVID-19 since entering Estrella Jail.

4. Approximately two months ago, I saw a medical provider in reference to a mole that had been biopsied. While seeing the provider, I was asked if I was vaccinated and was told of the importance of getting vaccinated against COVID-19 due to my age and medical conditions, but I did not receive any written information about the vaccines. The provider asked if I wanted to be vaccinated, I said yes, and was told by the provider that a vaccine would be ordered for me. I did not receive any further information from the provider or any other staff at the jail about when I would receive the vaccine.

5. I have been present when other people incarcerated in the Estrella jail received a COVID-19 vaccine, but each time jail staff provided vaccines to others my name was not read aloud from the list and I was not given the vaccine.

6. On February 8, 2022, I was told by other prisoners in my pod that my name was on the list to receive the vaccine, but I was in court for a hearing and could not receive the vaccine.

7. As of today, I have yet to receive a vaccine for COVID-19.

1 I, Jared G. Keenan, certify that I reviewed the information contained in this declaration
2 with Loretta Johnson by video on January 21, 2022 and on February 10, 2022, and that she
3 certified that the information contained in this declaration was true and correct to the best
4 of her knowledge.

5 Executed this 10th day of February 2022.

6 /s/ Jared G. Keenan
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