

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THOMAS REMICK, <i>et al.</i>	:	
and all others similarly situated,	:	
	:	CIVIL ACTION NO. 20-1959
Plaintiffs-Petitioners,	:	
	:	(Schiller, J.)
v.	:	
	:	
CITY OF PHILADELPHIA; and	:	
BLANCHE CARNEY, in her official	:	
capacity as Commissioner of Prisons,	:	
	:	
Defendants-Respondents.	:	

DECLARATION OF KENYATTA WHITE, JR.

I, Kenyatta White, Jr., hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 29 years old and currently incarcerated at Philadelphia Industrial Correctional Center (PICC).
2. I am currently housed on Unit J in cell 3.
3. Unit J is a disciplinary segregation unit, so, while we are not supposed to get as much time out of our cells as people on general population units, we are still supposed to receive out-of-cell time every day.
4. On Unit J, we rarely come out of our cells at all.
5. For example, from June 1-June 25, 2021, we only came out of our cells 7 times. From July 1-July 25, 2021, we only came out of our cells 8 times. From August 1-August 30, 2021, we only came out of our cells 5 times.

6. Being locked in almost all the time means that we very rarely get to take showers or use the phones.

7. We are incredibly isolated from our loved ones. My mother told me that she called the jail 15 to 20 times because she was so worried when I was not able to call her for three weeks.

8. When we do come out a handful of times per month, we come out for about 45 minutes.

9. Being locked in my cell for days and even weeks at a time is making me go crazy. I have to take medication now for anxiety, nightmares, depression, and panic attacks. I was not on any psychiatric medication before I came to jail. It seems like everyone on this block is on medication now to stay sane.

10. From August 19-August 25, 2021, staff did not pass out medications due to staff shortages.

11. In addition to the persistent lack of out-of-cell time, we are not given necessary supplies.

12. We often run out of toilet paper. We only receive one roll per week and sometimes they do not have enough so not everyone gets one. I have had to use sheets and socks when I ran out.

13. We cannot clean our cells properly because we do not receive enough supplies.

14. Someone from a different block used to pick up our clothes once a week for laundry, but lately no one has been coming around. so our only option is to wash our clothes by hand.

15. I have been in disciplinary or administrative segregation since October 10, 2020 because I got in an argument with a Correctional Officer about access to the phones. She said I had a weapon but no weapon was recovered. I received no hearing and had no opportunity to

challenge the accusations against me. I am no longer under disciplinary segregation status but I have no idea how long I will continue to be in administrative segregation.

I, Grace Harris, certify that Kenyatta White, Jr. relayed the above information to me over a video call on August 30, 2021, and that he gave me permission to relay this information in a declaration signed on his behalf. Because Mr. White, Jr. is incarcerated, the finished declaration has not been reviewed by Mr. White, Jr.

/s/ Grace Harris _____

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DECLARATION OF EDWARD HOLSEY

I, Edward Holsey, hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 50 years old and currently incarcerated at Riverside Correctional Facility (RCF).
2. I am currently housed on Unit G1 in cell 56.
3. On Unit G1, we do not get out of our cells every day.
4. For example, on August 14, 2021, no one was let out of their cells. On August 15, 2021, only half the unit was let out. Most recently, from Monday, August 23 through Sunday, August 29, 2021, we were locked in our cells without coming out for seven days straight.
5. When we do not come out of our cells, we cannot take showers or use the phones.
6. We received three different explanations as to why we were locked in our cells for a week straight. First, we were told a nurse had COVID-19. Then, we were told that people on each unit in the jail tested positive for COVID-19. Finally, we were told that we were locked down

because of issues with the cell doors. It was very confusing and frightening to be locked in our cells for so long and not even know why.

7. Due to this extreme lockdown, I and several other people on the unit missed our court dates.

8. Aside from the lockdown, when we do come out, we very rarely receive three hours out of our cells in a day.

9. On good days, half the block receives two hours out of their cells and then the other half of the block receives two hours out.

10. People become very antsy when they are locked in all the time and denied showers and phone calls.

11. Staff have responded to this reasonable frustration with increased threats and force, further increasing the tensions and violence. We are frequently threatened with pepper spray just for asking to come out to take showers and make phone calls.

12. On or around August 13, 2021, sliding bolt locks were installed on all of the cells on my unit. Now cell doors must be opened manually from the outside. I am very worried that this will be hazardous if there is a fire or another emergency. Before the installation of these locks, staff could open all the doors by pressing a single button. Now each lock must be opened individually.

13. It is particularly frightening to be manually locked in because frequently there are no staff present on the unit.

14. When we push the emergency buttons in our cells, staff do not respond.

15. These conditions make me feel trapped and enslaved. I feel like my rights are gone just because I was accused of a crime. I feel like I have no due process.

16. We have very little access to the law library. I have only been three times in the last two months. We are supposed to go twice per week.

17. At first, I did not take a COVID-19 vaccine because when I asked for information about the vaccine, medical staff yelled at me rather than provide me with information.

18. After I received information about the vaccines from an outside source, I decided to take the Johnson and Johnson vaccine. I have put in multiple sick call requests to receive it, one on August 23, 2021 and one August 26, 2021. I have still not received the vaccine or any response to my requests.

19. I only have two face masks. The last time staff passed out new masks was in June.

20. We do not receive any cleaning supplies to clean our cells.

21. We do not receive soap or razors regularly.

22. It is dehumanizing to be unable to groom ourselves or stay clean.

I, Grace Harris, certify that Edward Holsey relayed the above information to me over a video call on August 30, 2021, and that he gave me permission to relay this information in a declaration signed on his behalf. Because Mr. Holsey is incarcerated, the finished declaration has not been reviewed by Mr. Holsey.

/s/ Grace Harris

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DECLARATION OF JOHN HART

I, John Hart, hereby declare that the following is true and correct to the best of my knowledge and belief:

1. I am 45 years old and currently incarcerated at Curran-Fromhold Correctional Facility (CFCF).
2. I am currently housed on Unit D1P4 in cell 20.
3. On Unit D1P4, we do not all get out of our cells every day.
4. For example, on Thursday, August 12 and Friday, August 19, 2021, the entire block was locked in all day. On Friday, August 27, 2021, only cells 17-32 came out. On Saturday, August 28, 2021, only cells 1-8 came out. Today, August 30, 2021, staff did not open any cells until about 4:20pm, when they let out cells 17-29. Given that staff started running recreation so late, it will not be possible for everyone to come out today.
5. For the past few weeks, people have been coming out of their cells only about every other day.

6. When we do come out for recreation, it is never for three hours in a day. We receive about one to two hours of out-of-cell time when we are let out.

7. When the block officer has people sign the recreation sheet, they fill in the times after the fact so people do not know how much time out of their cells they are signing off on receiving.

8. People are feeling very desperate and hopeless due to the lack of out-of-cell time, especially because we cannot predict when we are going to come out. We do not feel like we are being treated humanely.

9. Staff tell us that the lack of out-of-cell time is due to staff shortages.

10. There are often no officers on the block at all during the 3pm-11pm and 11pm-7am shifts.

11. Staff shortages have also been affecting other necessary jail functions, including distribution of medication and mail.

12. We did not receive medications on our unit from Thursday, August 19 at 7am until Saturday, August 21 at 10am. Many people went over 48 hours without their medications.

13. I have not been receiving my legal mail until weeks after it was sent. My criminal lawyer has sent me multiple packets of documents related to my case that I have not received. He sent one document with a delivery confirmation receipt and I could see that it was received by PDP eight days before it was given to me. I still have not received legal mail that my attorney told me was confirmed received by PDP at the beginning of August.

14. I have not been able to use the law library since 2020 because there is no one to staff it.

15. Staff have not passed out new face masks in about a month. I only have one mask, which means I have to go without a mask when I wash it.

Pursuant to 28 U.S.C. § 1746, I, John Hart, declare under penalty of perjury that the foregoing is true and correct. Executed this 30th day of August, 2021.



John Hart