

FILED 4/21/20

THE PLAINTIFFS

Plaintiff Keith Seth has chronic bronchitis for which he was hospitalized last year. He is currently experiencing symptoms of COVID-19, including loss of taste, diarrhea, coughing and severe shortness of breath. He cannot afford to pay the money required to request medical assistance. He has bipolar disorder; since the outbreak at the Jail, he has not received needed mental health treatment.

Plaintiff Mario Burch is detained pretrial. He has not seen anyone clean or sanitize any surfaces in his unit. He is “extremely scared of contracting the virus.” Mr. Burch’s bond was originally set at \$3000, but he could not afford to purchase his release. On April 9, 2020, the court revoked his bond. He is facing two charges, each of which has a maximum sentence of 90 days.

Plaintiff John Doe No. 1 suffers from acute asthma. He has recently experienced symptoms of COVID-19: headaches, nausea, and shortness of breath. A court approved him to be released on home detention. The Pretrial Services Agency, which is part of the Department of Corrections, has not released him.

Plaintiff John Doe No. 2 suffers from severe asthma, for which he previously has been hospitalized. He has been spitting up brown mucus and having trouble breathing. He has asked for medical attention or a test for COVID-19, but he was refused and told that the Medical Unit is too full. He asked for an inhaler, but his request was denied.

Plaintiff John Doe No. 3 is detained pretrial. He uses a cane to walk and has numerous medical issues. Prior to the outbreak, he was housed in the Medical Unit. In late March, he was transferred to Housing Unit 11-B, which houses medically vulnerable prisoners, but does not have any on-site medical equipment or staff. A court approved him for release. Pretrial services has not released him. ■