

1 BILL LOCKYER  
Attorney General of the State of California  
2 JAMES M. HUMES  
Chief Assistant Attorney General  
3 FRANCES T. GRUNDER  
Senior Assistant Attorney General  
4 JONATHAN L. WOLFF  
Supervising Deputy Attorney General  
5 TIMOTHY J. MCDONOUGH, State Bar No. 235850  
Deputy Attorney General  
6 455 Golden Gate Avenue, Suite 11000  
San Francisco, CA 94102-7004  
7 Telephone: (415) 703-5606  
Fax: (415) 703-5843  
8 Email: [Tim.McDonough@doj.ca.gov](mailto:Tim.McDonough@doj.ca.gov)  
Attorneys for Defendants M. Tuntakit and S. Roach  
9 SF2004401304

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11 IN THE UNITED STATES DISTRICT COURT  
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
13 SAN FRANCISCO DIVISION

14 **GERRY WILLIAMS ,**

15 Plaintiff,

16 v.

17 **LIEUTENANT ROSS, et al.,**

18 Defendants.  
19

CASE NO. C 04-2409 SI (pr)

**DECLARATION OF  
TIMOTHY J. MCDONOUGH  
IN SUPPORT OF  
DEFENDANTS' MOTION  
FOR SUMMARY JUDGMENT**

20 I, Timothy J. McDonough, declare as follows:

21 1. I am an attorney admitted to practice before the courts of the State of California and  
22 before this Court. I am employed by the California Attorney General's Office as a Deputy  
23 Attorney General in the Correctional Law Section. I am assigned to represent Defendants M.  
24 Tuntakit and S. Roach (Defendants) in this case. I am competent to testify to the matters as set  
25 forth in this declaration, and if called to do so, I would and could so testify. I submit this  
26 declaration in support of Defendants' Motion for Summary Judgment.

27 2. Attached as Exhibit A is a true and correct copy of the condensed version of the  
28 Deposition of Plaintiff Gerry Williams (Plaintiff) taken on September 6, 2006.

1 3. Attached as Exhibit B is a true and correct copy of the condensed version of the  
2 Deposition of Defendant Roach taken on August 30, 2006.<sup>1/</sup>

3 4. Attached as Exhibit C is a true and correct copy of the condensed version of the  
4 Deposition of Defendant Michael Tuntakit taken on August 31, 2006.

5 5. Attached as Exhibit D is a true and correct copy of the condensed version of the  
6 Deposition of inmate Charles Jordan taken on September 7, 2006.

7 6. Attached as Exhibit E is a true and correct copy of the condensed version of the  
8 Deposition of inmate Jeffrey Leon Moore taken on September 8, 2006.

9 7. Attached as Exhibit F is a true and correct copy of the condensed version of the  
10 Deposition of Dr. William Breall taken on October 17, 2006.

11 8. Attached as Exhibit G are true and correct copies of medical documents regarding  
12 Plaintiff, dated September 6, 2003. Copies of these documents were attached as Exhibit 14 to the  
13 Deposition of Michael Tuntakit.

14 9. Attached as Exhibit H is a true and accurate copy of a declaration of inmate Charles  
15 Jordan dated September 12, 2005. A copy of this document is attached as Exhibit 23 to the  
16 deposition of inmate Charles Jordan.

17  
18 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
19 knowledge and that this declaration is executed on October 27, 2006 at San Francisco,  
20 California.

21   
22 TIMOTHY J. MCDONOUGH

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28 1. Pursuant to an agreement with Plaintiff's counsel, Defendant Roach's address, which  
appears on page 5, line 13 has been redacted.