

1 Geri Lynn Green (SBN 127709)
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5 Attorneys for Plaintiffs
 6 SHANELL RENEE STEWART, MARY PAYNE,
 7 HERLINDA ARROYO-DE HERNANDEZ and
 CAROL BIRDSONG

8
 9 IN THE UNITED STATES DISTRICT COURT

10 IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

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| 12 | SHANELL RENEE STEWART, MARY |) Case No.: C 01-4058 MJJ (JCS) |
| 13 | PAYNE, HERLINDA ARROYO-DE |) E-FILING CASE |
| 14 | HERNANDEZ and CAROL BIRDSONG, |) |
| 15 | Plaintiffs, |) DECLARATION OF GERI LYNN |
| 16 | v. |) GREEN IN SUPPORT OF |
| 17 | KATHLEEN HAWK SAWYER, ROBERT M. |) PLAINTIFFS' OPPOSITION TO |
| 18 | HARO, MICHAEL BENOVA, PAUL |) DEFENDANTS' MOTION FOR |
| 19 | SCHULTZ, JOHNSIE DONALDSON, SHEILA) |) SUMMARY JUDGMENT |
| 20 | CLARK, FEDERAL BUREAU OF PRISONS,) |) |
| 21 | and Does 1-100, inclusive.) |) |
| 22 | Defendants.) |) |
| 23 |) |) |
| 24 |) |) |
| 25 |) |) |

22
 23 I, Geri Lynn Green, declare:

24 I am an attorney licensed to practice in all the courts of this state. I represent Plaintiffs
 25 Shanell Renee Stewart, Mary Payne, Herlinda Arroyo-De Hernandez and Carol Birdsong in this
 26 action. I have personal knowledge of the matters set forth herein and could competently testify to
 27 them if called as a witness.

- 1 1. Attached hereto as Exhibit A is a true and correct copy of materials from the
2 Bureau of Prisons section PS 1330.13, entitled Administrative Remedy Program,
3 Change Notice Number CN-03, dated 10/7/97, signed by Director, Kathleen M.
4 Hawk;
- 5 2. Attached hereto as Exhibit B is a true and correct copy of the Federal Bureau of
6 Prisons' Program Statement, Number 5324.04, dated 12/31/97, entitled Sexual
7 Abuse/Assault Prevention and Intervention Programs, signed by Director,
8 Kathleen M. Hawk, Bates stamped USA03893-03892. Said exhibit was
9 submitted as Exhibit 7 to the deposition of Warden Paul Schultz, taken on May
10 26, 2004;
- 11 3. Attached hereto as Exhibit C is a true and correct copy of the Federal Bureau of
12 Prisons FCI/FPC/FDC Dublin, California, document, entitled, Pat Search
13 Evaluation, dated 4/23/01, re: Plaintiff Carol Ann Birdsong, Bates stamped
14 USA02139-02141. Said exhibit was submitted as an exhibit to Dr. Formanski,
15 taken on May 26, 2004;
- 16 4. Attached hereto as Exhibit D is a true and correct copy of excerpts from the
17 deposition of Linda R. Thomas, taken on September 8, 2004;
- 18 5. Attached hereto as Exhibit E is a true and correct copy of excerpts from the
19 deposition of Warden Paul Schultz, taken on May 26, 2004;
- 20 6. Attached hereto as Exhibit F is a true and correct copy of the Federal Correctional
21 Institution, Dublin, California, entitled Institution Supplement, Number DUB
22 5324.04(C), dated June 15, 2004, subject: Sexual Abuse/Assault Prevention and
23 Intervention Programs, signed by Warden, Paul M. Schultz, Bates stamped
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1 USA03912-03915. Said exhibit was submitted as Exhibit 8 to the deposition of
2 Warden Paul Schultz, taken on May 26, 2004;

3 7. Attached hereto as Exhibit G is a true and correct copy of the Federal Bureau of
4 Prisons' materials from the Introductory Correctional Training Program Manual;
5 entitled, Search Procedures; Conducting a Pat Search and Visual Search, Bates
6 stamped USA00020-00029. Said exhibit was submitted as Exhibit 5 to the
7 deposition of Warden Paul Schultz, taken on May 26, 2004;

8 8. Attached hereto as Exhibit H is a true and correct copy of the Federal Bureau of
9 Prisons' Sexual Abuse/Assault Prevention and Intervention training manual, Bates
10 Stamped USA00001-00019. Said exhibit was submitted as Exhibit 9 to the
11 deposition of Warden Paul Schultz, taken on May 26, 2004;

12 I declare under the penalty of perjury under the laws of the State of California that the
13 foregoing is true and correct.

14 DATED this 12th day of October 2004

15 Respectfully submitted,

16 **LAW OFFICES OF GERI LYNN GREEN**

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