

EXHIBIT G

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

DAVID OLABAYO OLANIYI,

Plaintiff,

-against-

DISTRICT OF COLUMBIA, ET AL.,

Defendants.

Civil Action No. 05-00455 (RBW)

DECLARATION OF JENNAFER B. NEUFELD

JENNAFER B. NEUFELD declares, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am counsel for David Olabayo Olaniyi (“Olaniyi”), the Plaintiff in this action. I respectfully submit this Declaration in conjunction with Olaniyi’s Opposition to Defendant District of Columbia’s Motion to Dismiss or Alternatively, for Summary Judgment.

2. On March 3, 2005, Olaniyi commenced this action seeking damages for violations of his constitutional rights by the District of Columbia under 42 U.S.C. § 1983. Olaniyi filed his First Amended Complaint on June 14, 2005, amending and adding certain claims against Defendant District of Columbia. On October 31, 2006, Olaniyi filed his Second Amended Complaint which identified John Doe defendants, but made no changes in the claims against Defendant District of Columbia.

3. Olaniyi propounded Interrogatories and Requests for Production of Documents to Defendant District of Columbia pursuant to Rules 33 and 34 of the Federal Rules of Civil Procedure on August 31, 2005.

4. Olaniyi received limited responses to his discovery requests and has been in continuing discussions with counsel for the Defendant concerning the scope of discovery. Defendant has not responded to various requests from Olaniyi concerning the document discovery received to date. Defendant has not produced any documents concerning the policies, practices, and customs Defendant established in operating the D.C. Jail beyond the D.C. and C.C.H.P.S. contractual materials. The Defendant has not provided Olaniyi with relevant documents, such as records relating to the selection of C.C.H.P.S. as the vendor hired to provide mental health and medical care services to D.C. Jail inmates.

5. The Defendant has declined to respond to requests for clarification concerning its responses to Olaniyi's discovery requests, and has otherwise avoided meeting and conferring with Olaniyi's counsel regarding long-standing discovery disputes. For example, on October 20, 2006, I sent a letter to counsel for the Defendant requesting clarification and amplification of Defendant's responses to Plaintiff's Second Request for the Production of Documents and highlighted five ways in which such responses were deficient. See Ex. E to Olaniyi's Brief in Opposition. The Defendant has never responded to this letter.

6. Olaniyi has not had the opportunity to depose the D.C. Jail personnel who interacted with Olaniyi in the D.C. Jail. Due to the various discovery stays put in place by the Court at the request of the defendants, Olaniyi has had no opportunity to obtain discovery from Defendants Gibson and Mills personally including, without limitation, discovery concerning their knowledge and understanding of the Defendant's policies, practices, and customs that regulated the treatment of inmates in the D.C. Jail.

7. Pursuant to the Court's order of March 21, 2007, a stay is currently in effect regarding discovery matters until such a time as the Court has ruled upon Defendant's pending motion.

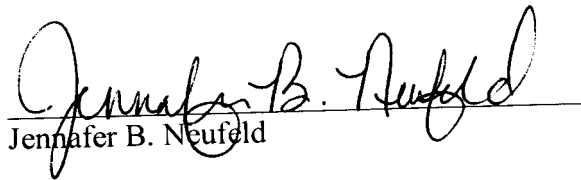
8. Olaniyi requires further discovery concerning the relationship between the C.C.H.P.S. and Defendant, as well as authority delegated to C.C.H.P.S. by Defendant. Moreover, Olaniyi requires additional discovery concerning the policies and practices relating to the administration of psychotropic and/or anti-psychotic drugs, use of force, use of chemical restraints, and related matters. Olaniyi also requires further discovery to identify the official or officials with final policy-making authority who acquiesced to, failed to act in response to, and/or endorsed the custom or practice which led to Olaniyi's injuries.

9. Given the limited time available for discovery in this case, no depositions have been conducted.

10. Through further discovery, Olaniyi hopes to discover, *inter alia*, (1) who forcibly injected him against his will; (2) the medication with which he was injected; (3) the identity of the official(s) with final policy-making authority who acquiesced to the Defendant's custom of deliberate indifference; (4) the awareness of the Defendant for potential harm to D.C. Jail inmates caused by the involuntary and unconstitutional administration of medication; (5) additional policies or procedures which led to the forcible injection of Olaniyi against his will; and (6) prior instances of constitutional violations caused by the Defendant's policy or custom and/or deliberate indifference to the potential harm of D.C. Jail inmates.

11. Due to the facts stated above, Olaniyi requires further discovery to be had and depositions to be taken pursuant to Rule 56(f) of the Federal Rules of Civil Procedure in order to oppose the Defendant's Motion.

I declare under penalty of perjury that the foregoing is true to the best of my knowledge, information, and belief.


Jennifer B. Neufeld

8/21/07
Date