IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

MARCIANO PLATA , et al., Plaintiffs v. ARNOLD SCHWARZENEGGER, et al., Defendants,	NO. C01-1351-T.E.H. **APPENDIX OF PHOTOGRAPHS IN SUPPORT OF THE RECEIVER'S SECOND BI-MONTHLY REPORT**

TABLE OF CONTENTS

54 photographs

Photo Credit: Photography by Ray Chavez for the Receiver

1. **East Block/Death Row Clinic** (photographs 1A – 1J)

2. **Neumiller Building/Main Medical Facility/Staff Areas**

   Medical Supplies (photographs 2A – 2D)

   Pharmacy (photographs 2E – 2H)

   Medical Records (photographs 2I – 2K)

3. **Facilities/Physical Plant** (photographs 3A – 3D)

4. **Other Clinical Space/Patient Treatment Areas**

   Triage and Treatment Areas (photographs 4A – 4D)

   Laboratory (photographs 4E – 4F)

   Specialty Clinics (photographs 4G – 4I)

   Reception Center Physicals Waiting Area (photographs 4J – 4K)

   Outpatient Housing Unit (photographs 4L – 4P)

   West Block Clinic (photographs 4Q – 4R)

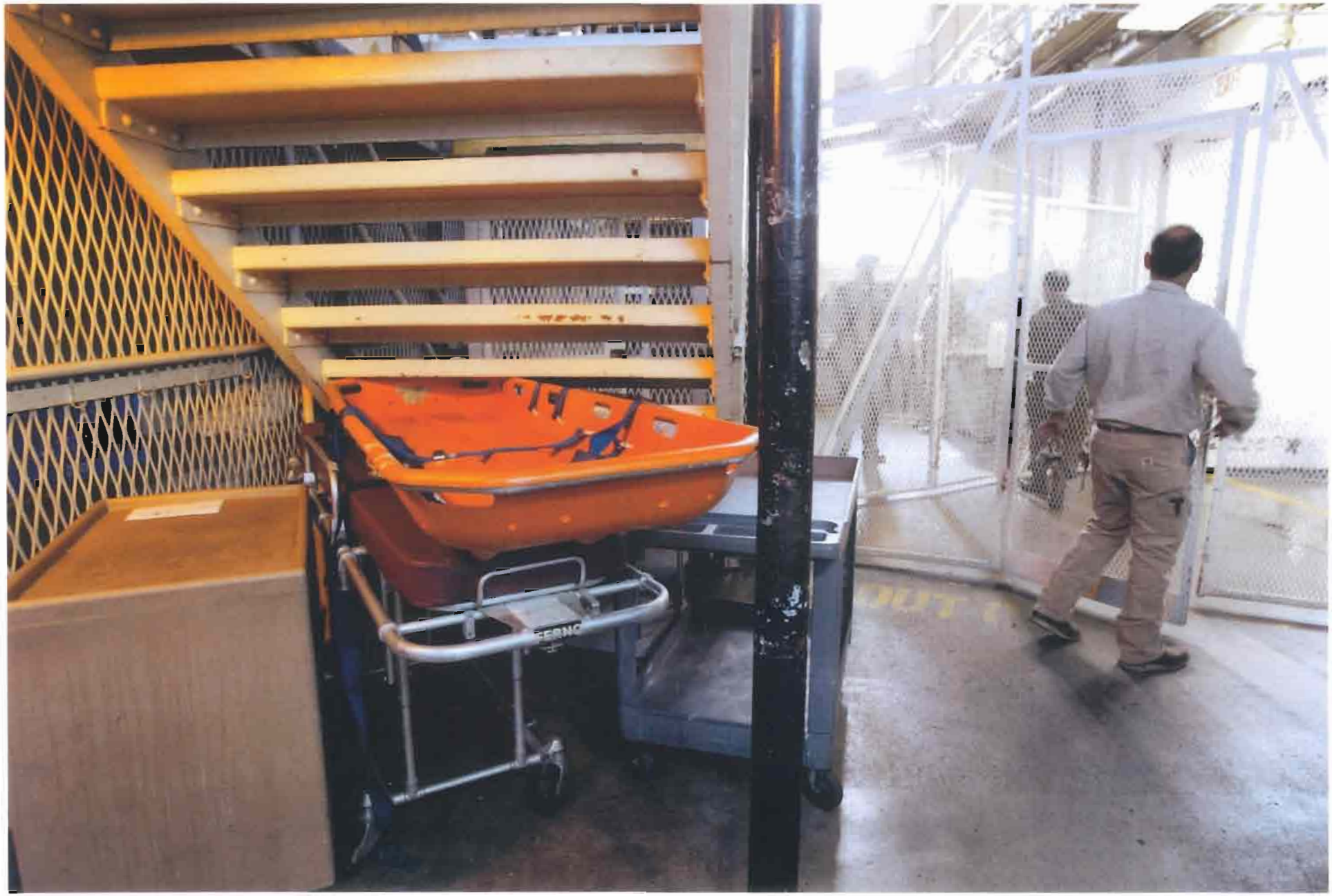
   North Block Clinic (photographs 4S – 4W)

5. **Gymnasium/Housing Unit/Clinic** (photographs 5A – 5D)

East Block/Death Row Clinic

(photographs 1A – 1J)

1A: An emergency gurney sits under stairs at the entrance to East Block, the condemned housing unit.



1B: The second tier inmate shower is visible (orange interior) directly over a mildewed shower curtain hung to protect medical and custody staff and patients from the streams of water that flow over the railing and onto the floor when the shower is in use.

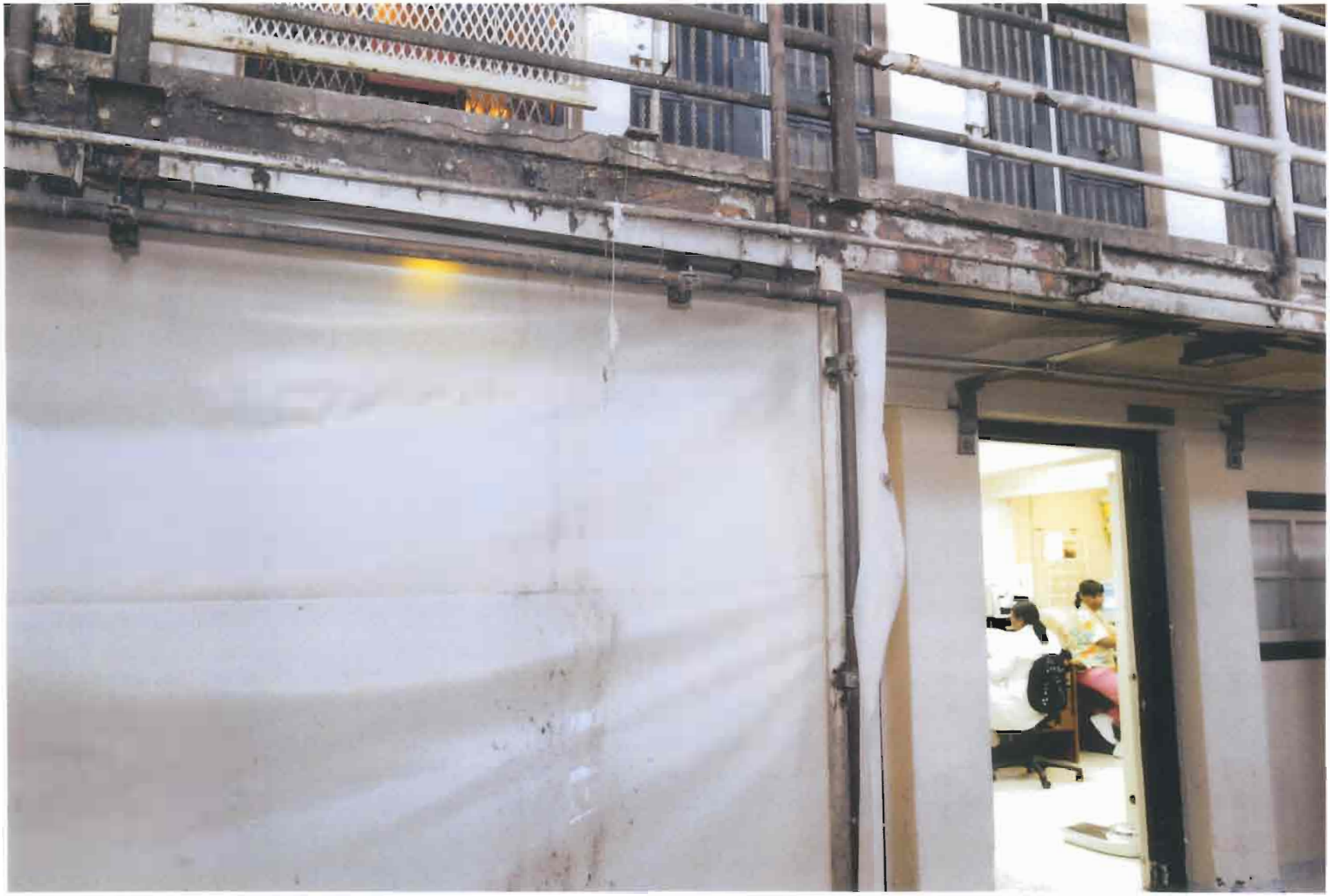
An MTA is visible in the medical clinic to the right, a staff room stands open on the left.

1C: Water from the shower in the tier above pools on the floor, creating slippery conditions. Pictured is a correctional officer transporting a condemned inmate, with the medical clinic visible through the open door in background.

The mildewed shower curtain which hangs just outside the door partially protects medical and custody staff and patients from falling water.

1D: Showers in the four tiers above the East Block Death Row clinic send water, soap and hair down the tiers, streaming in front of the clinic door, which is partially protected by a mildewed shower curtain.

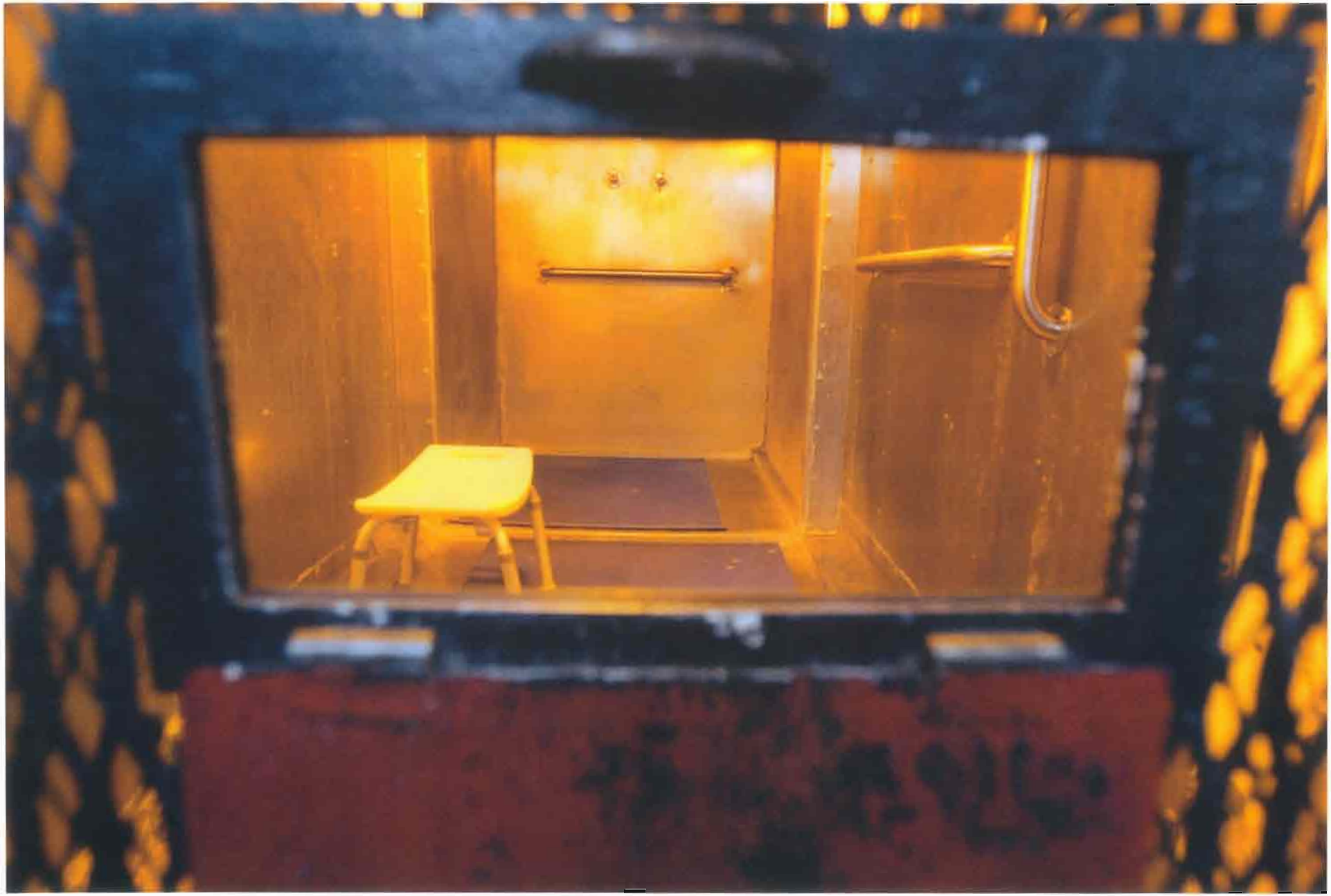
Pictured here, string and hair that were caught in the stream cling to a pipe. Medical staff is visible through the open door of the clinic.



1E: Showers in the four tiers above the East Block Death Row clinic send water, soap and hair down the tiers, streaming in front of the clinic door, which is partially protected by a mildewed shower curtain.

Pictured here, surgical gloves that were caught in the stream.

1F: The inmate shower is next door to the East Block Death Row clinic. When the shower is in use, water streams out onto the floor in front of the clinic.



1G: A prisoner patient waits in a cage outside the East Block Death Row clinic, having his vital signs taken through the door port before seeing his attending physician.

1H: The crowded and unsanitary conditions in the East Block Death Row clinic, which was created from a converted cell. Many of the institution's sickest inmates are examined here.

K V D
N S H C
H S K R N
C H K R V D

1I: Both medical and correctional escort personnel must crowd into the East Block Death Row clinic, which has room for one patient at a time.

KVD
ZSHC
HSKRN

1J: Peeling paint chips dust the floor under the wooden desk shown in previous photo (1I).

Neumiller Building/Main Medical Facility/Staff Areas

(photographs 2A – 2K)

Medical Supplies

(photographs 2A – 2D)

2A: San Quentin's medical supply clerk, hired as part of the Receiver's San Quentin project, stands in the over-crowded supply room.

A hole in the ceiling reveals a pipe repaired with duct tape.

2B: Ceiling damage in the medical supply room.

2C: Ceiling damage in the medical supply room. Plastic hangs over holes to protect medical supplies from leaks.

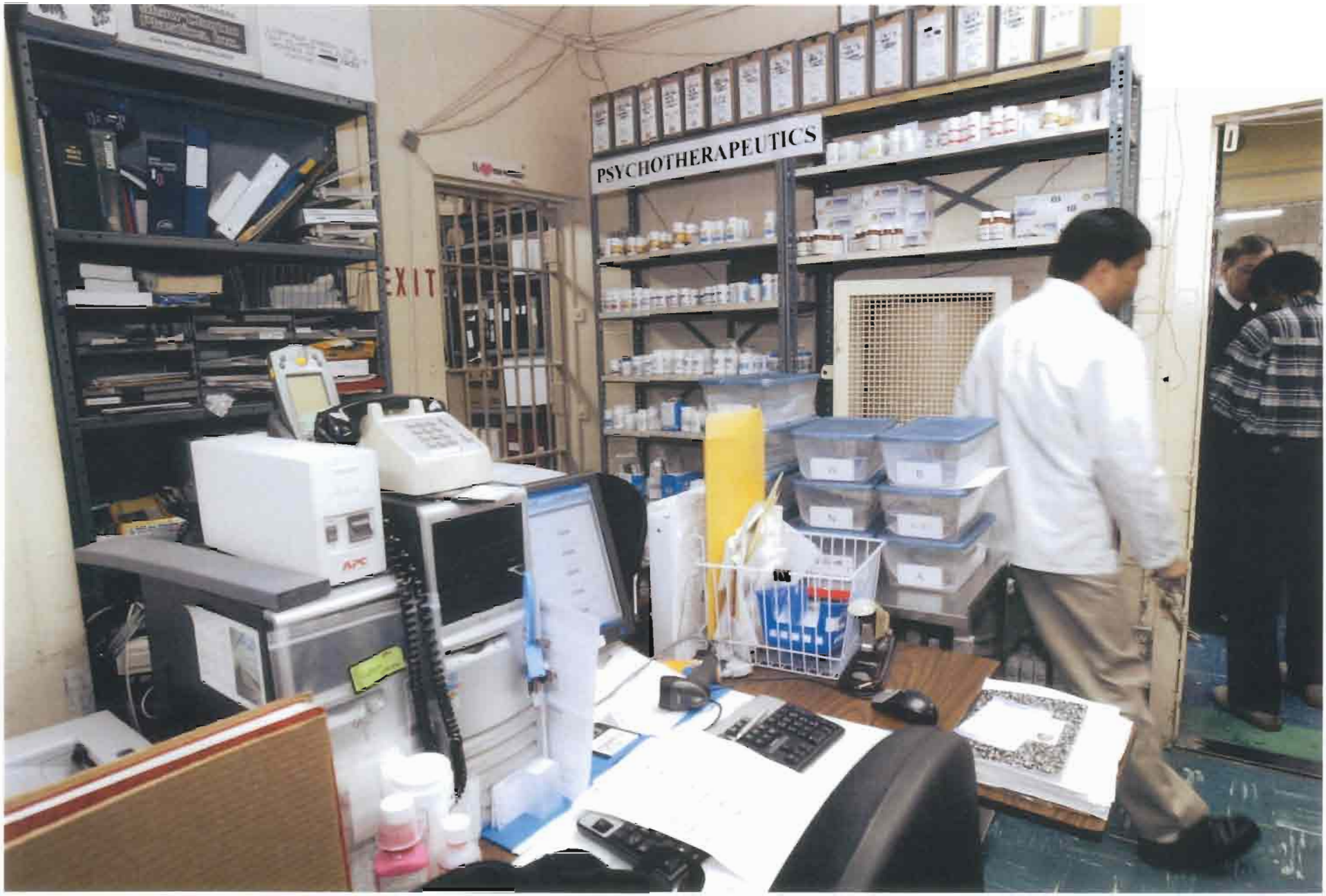
2D: Extremely crowded and disorganized conditions in the medical supply room.

CPS
COMPRESS
WATER
PITCHER

Pharmacy

(photographs 2E – 2H)

2E: Crowded working conditions and out-dated equipment in San Quentin's pharmacy.


PSYCHOTHERAPEUTICS
EXIT

2F: Filling orders off supply shelves in San Quentin's pharmacy.

2G: The refrigeration unit at San Quentin's pharmacy stands next to the staff refrigerator. Debris and old equipment is piled on top.

FLEX-A-TOP
FOOD ONLY

2H: The Narcotics Cage at San Quentin's pharmacy.

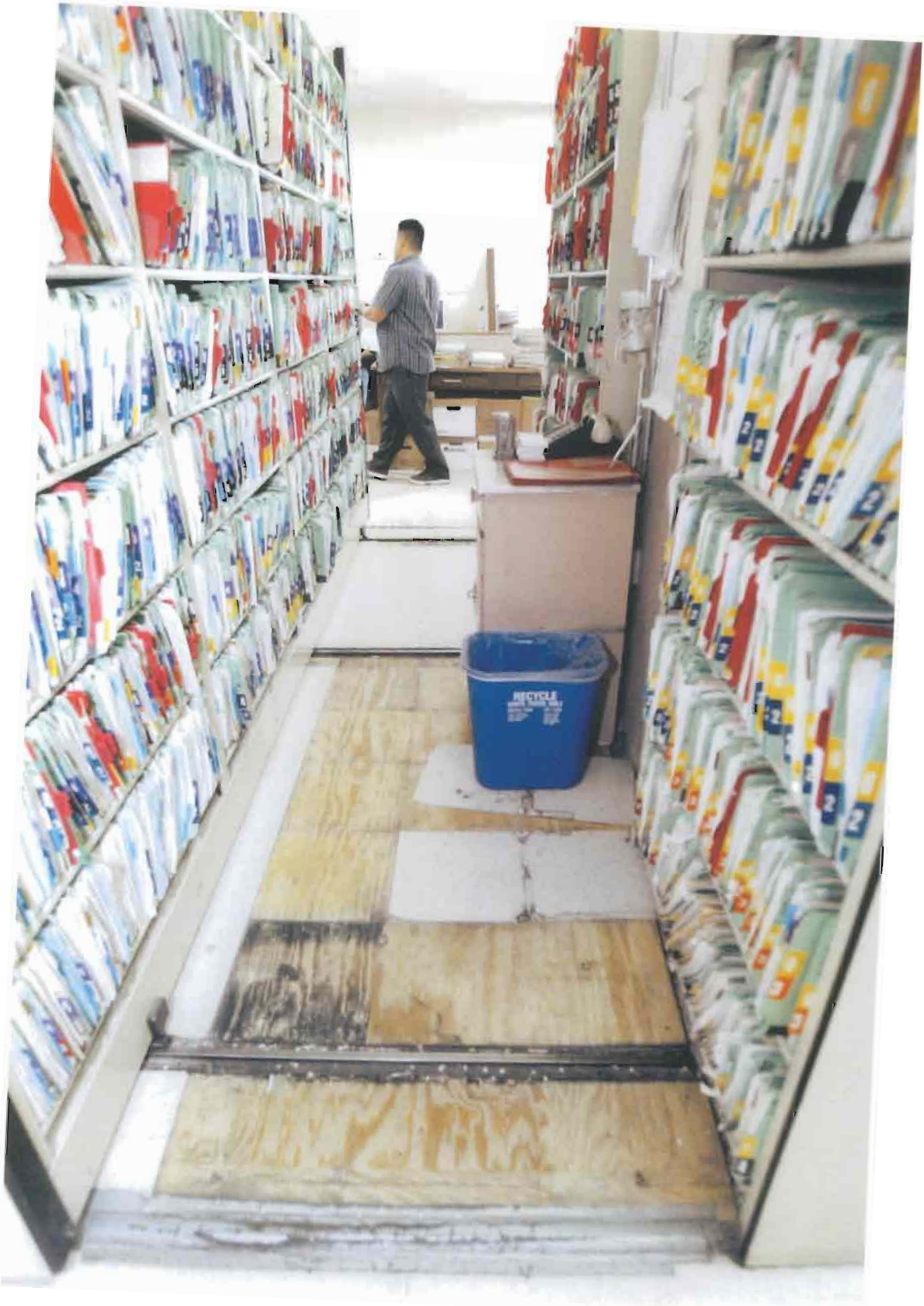
EXIT

Medical Records

(photographs 2I – 2K)

2I: Floor damage creates a hazard for staff in the medical records department.

2J: A badly damaged floor and small, out-dated work station in San Quentin's medical records department.


RECYCLE

2K: Charts pulled for clinics wait on shelves in the medical records department. Note litter on floor.

COD (4TH)
4TH FLOOR INFIRMARY
MENTAL HEALTH
9 Chart(s) Requested
Wednesday, August 30, 2006
PARECKI
ADJUSTMENT CENTER
MENTAL HEALTH
2 Chart(s) Requested
Wednesday, August 30, 2006

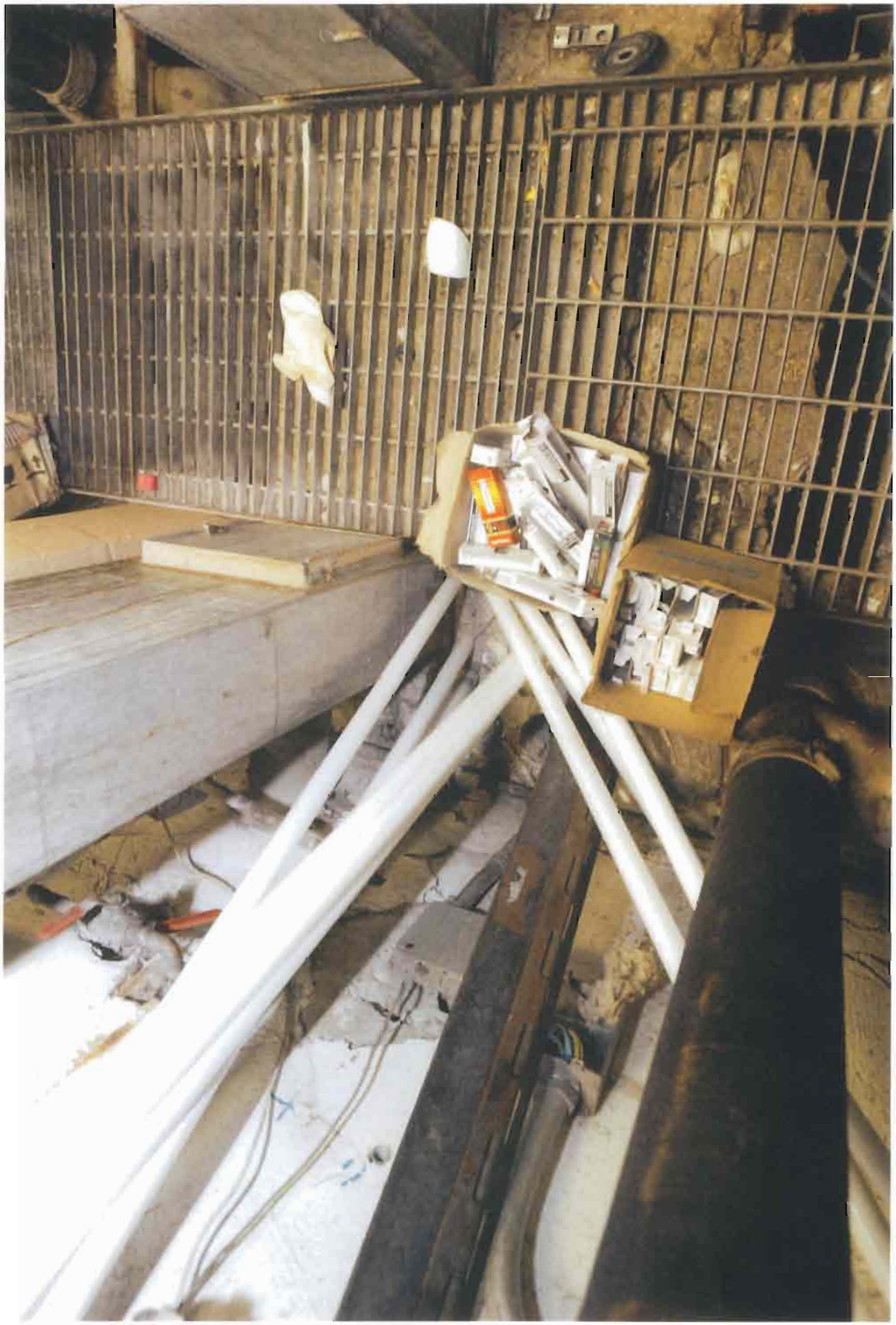
Facilities/Physical Plant

(photographs 3A – 3D)

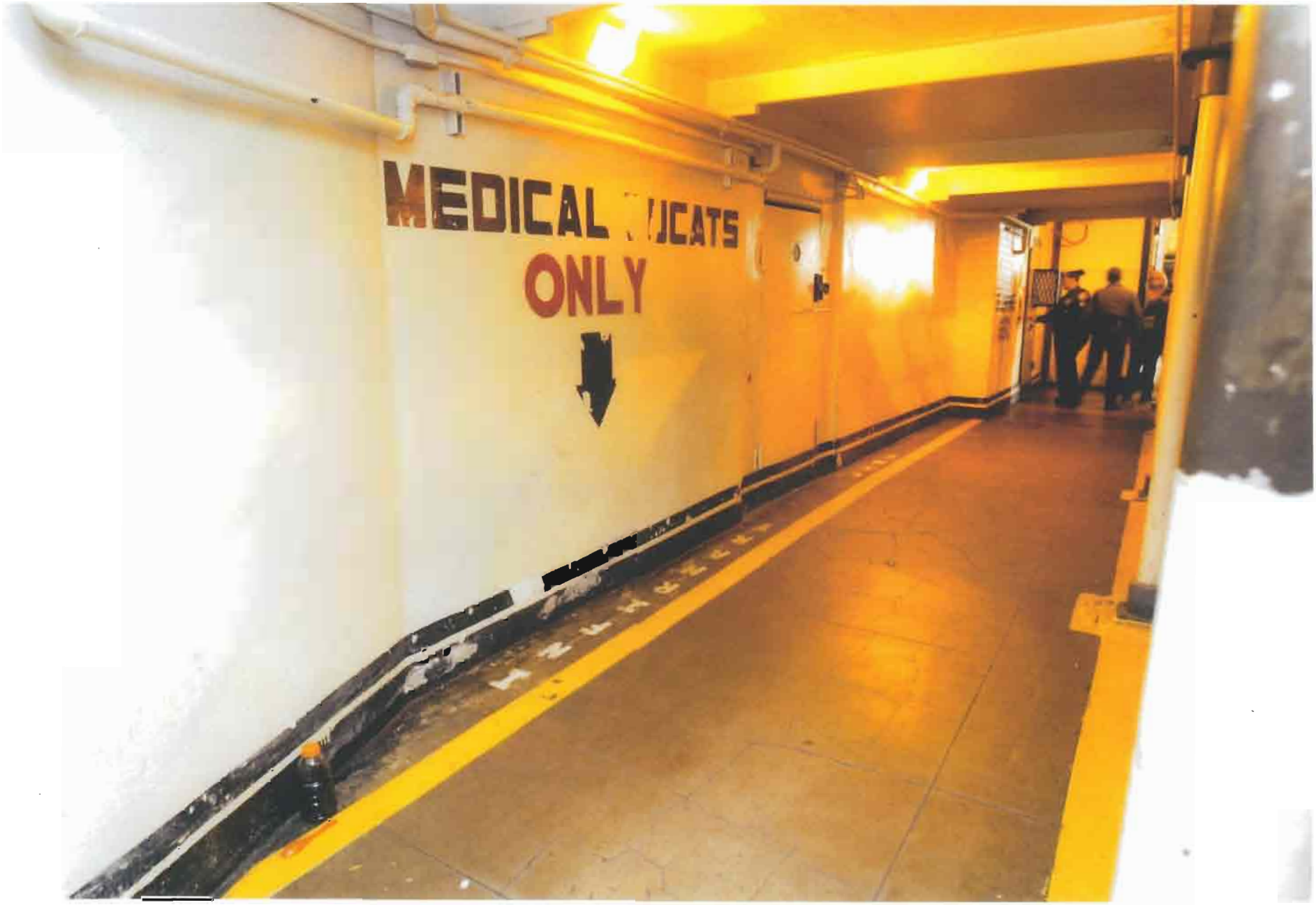
3A: The maintenance "alley" running behind the cells between Carson and Donner section in the South Block housing unit.

This area contains the utility chases for hot and cold water, sewage, heating and ventilation ducts, electrical connection and the fire sprinkler system.

Here, a pile of supplies adds to unsanitary conditions. Note the crumbling plaster on wall, and broken panel below the metal walkway.



3B: "Medical Ducats Only" is painted, and peeling off, a wall in South Block where inmate patients wait for access into the adjoining Neumiller building for clinic visits. Note the litter on floor.


MEDICAL
ONLY

3C: Charts for inmate patients from Alpine and Badger sections of the South Block housing unit have been assembled together on portable carts and stowed in a work area where sick call shares space with specialty appointments.

AGING

3D: A crowded staff area and supply space in the area where Alpine and Badger sick call share space with specialty appointments. Note the open bag of sugar in box on shelf.

Other Clinical Space/Patient Treatment Areas

(photographs 4A – 4Y)

Triage and Treatment Area

(photographs 4A – 4D)

4A: An inmate patient lies on a gurney in the Triage and Treatment Area (TTA), San Quentin's emergency room. The two bay treatment area in the Neumiller building serves the institution's more than 5,000 inmates.

CDC

4B: Close-up photograph of the TTA's badly damaged and outdated medical supply storage area.

CHEST PAIN
TAPE
INSTRUMENTS
DRESSING SUPPLIES
THERMOMETER COVERS
EKG SUPPLIES

4C: Medical equipment and trash in the TTA.

4D: Inmate patients wait in a caged area outside the TTA for medical appointments in the Neumiller building. At right, officers escort condemned inmates back to their housing unit.

The hallway has been recently painted by casual (union) laborers hired as part of the Receiver's San Quentin project.

STOP

Laboratory

(photographs 4E – 4F)

4E: San Quentin's laboratory has two chairs to serve more than 5,000 prisoner/patients. Here, a patient waits for a blood draw amid crowded conditions.

ml
MARKETLAB

4F: A lab tech interviews a San Quentin prisoner/patient. Note the location of the fax machine, directly in the patient's line of sight.

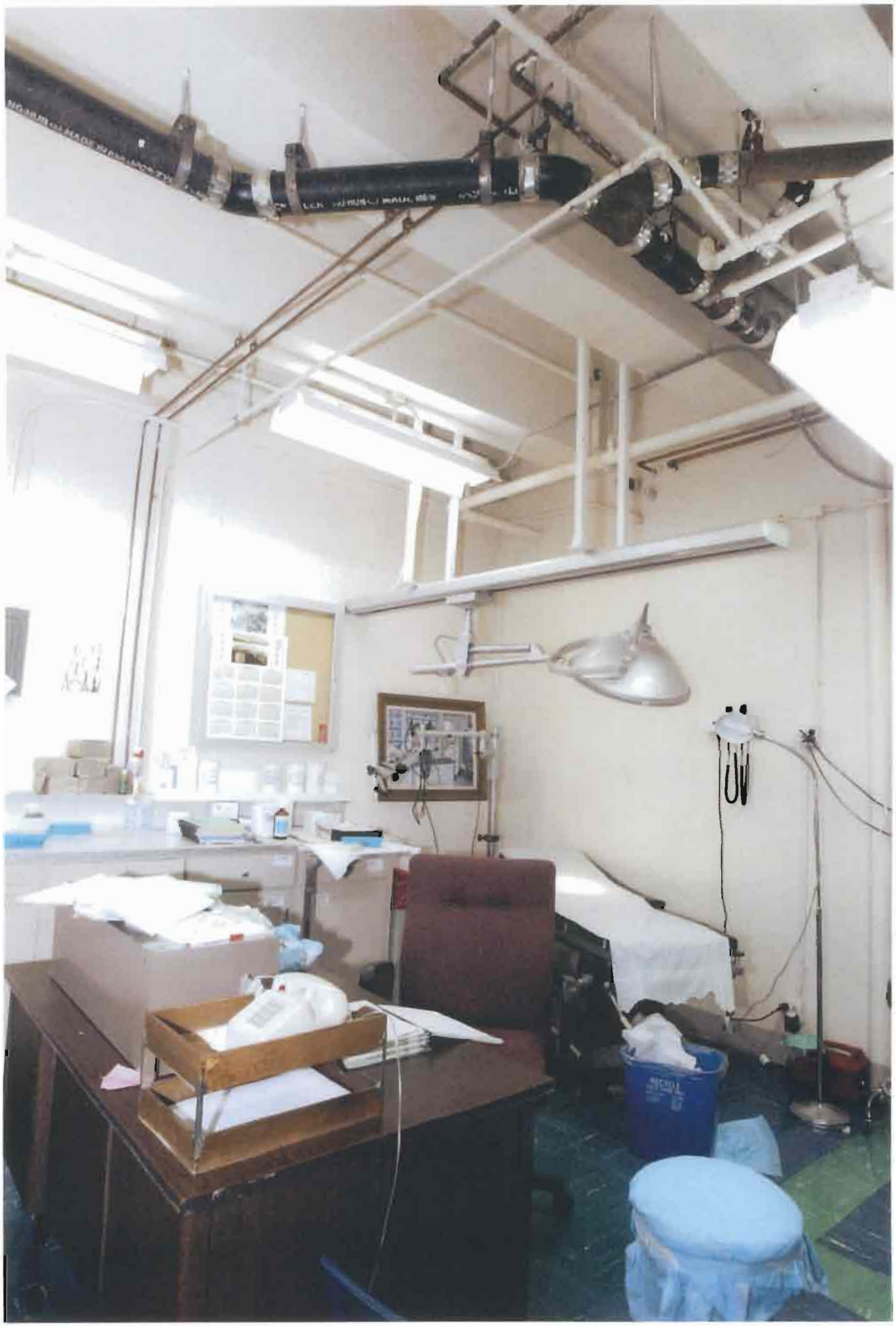
Specialty Clinics

(photographs 4G – 4I)

4G: Out-dated equipment in San Quentin's optometry clinic.

4H: A jumbled pile of medical supplies sits in the foreground on a desk in San Quentin's specialty clinic, while a medical staff member uses the phone.

4I: Sewage pipes (black) hang unprotected above the operating table in San Quentin's cluttered specialty clinic.



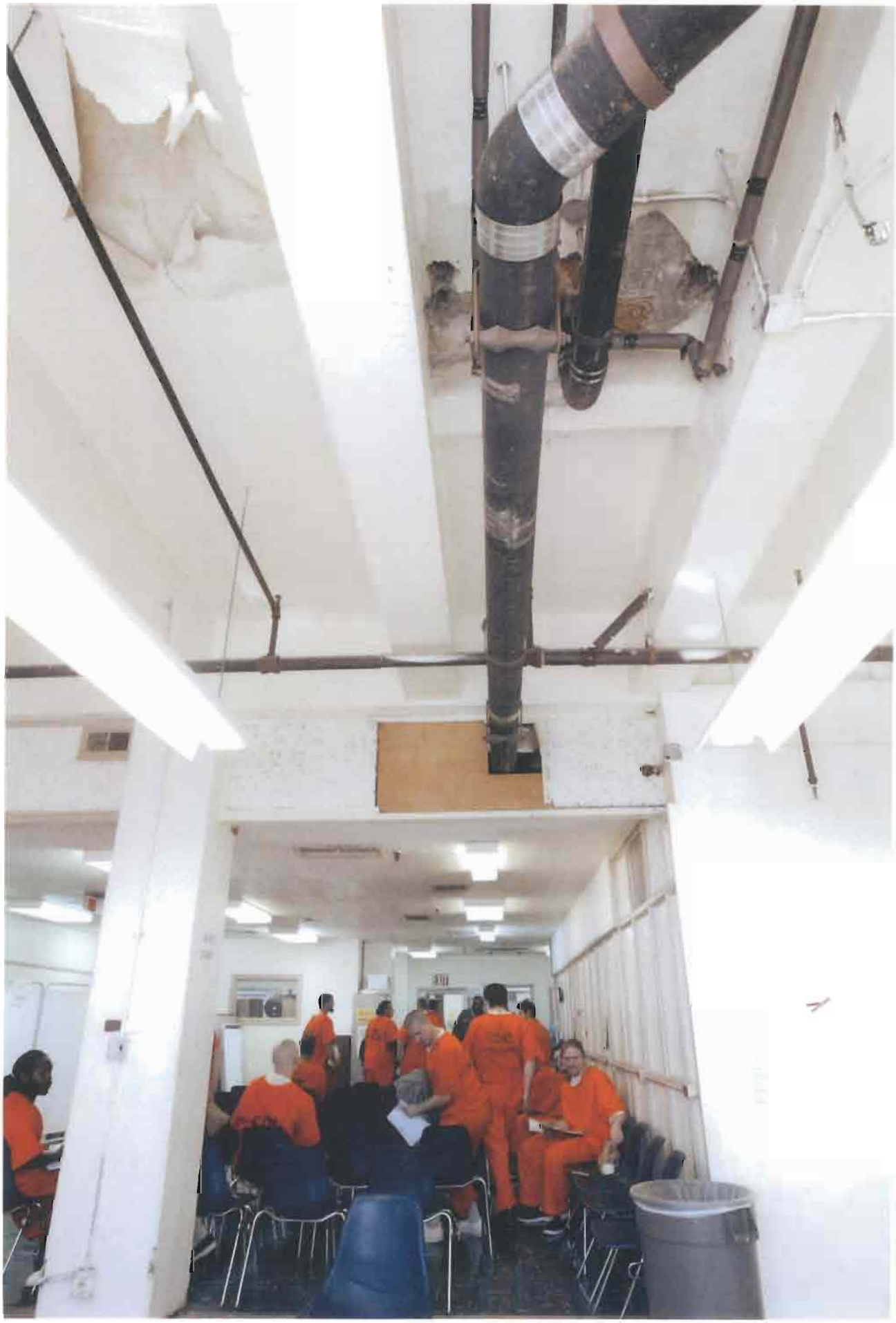
Reception Center Physicals Waiting Area

(photographs 4J – 4K)

4J: Reception center prisoner/patients wait for their intake physicals on right, while a condemned prisoner/patient uses a stationary bike for physical therapy on the left, behind low cloth screens.

CDC

4K: The dilapidated ceiling in the reception center physical waiting area/physical therapy site.



Outpatient Housing Unit (OHU)

(photographs 4L – 4P)

4L: A prisoner/patient in a medical cell in San Quentin's Outpatient Housing Unit (OHU).

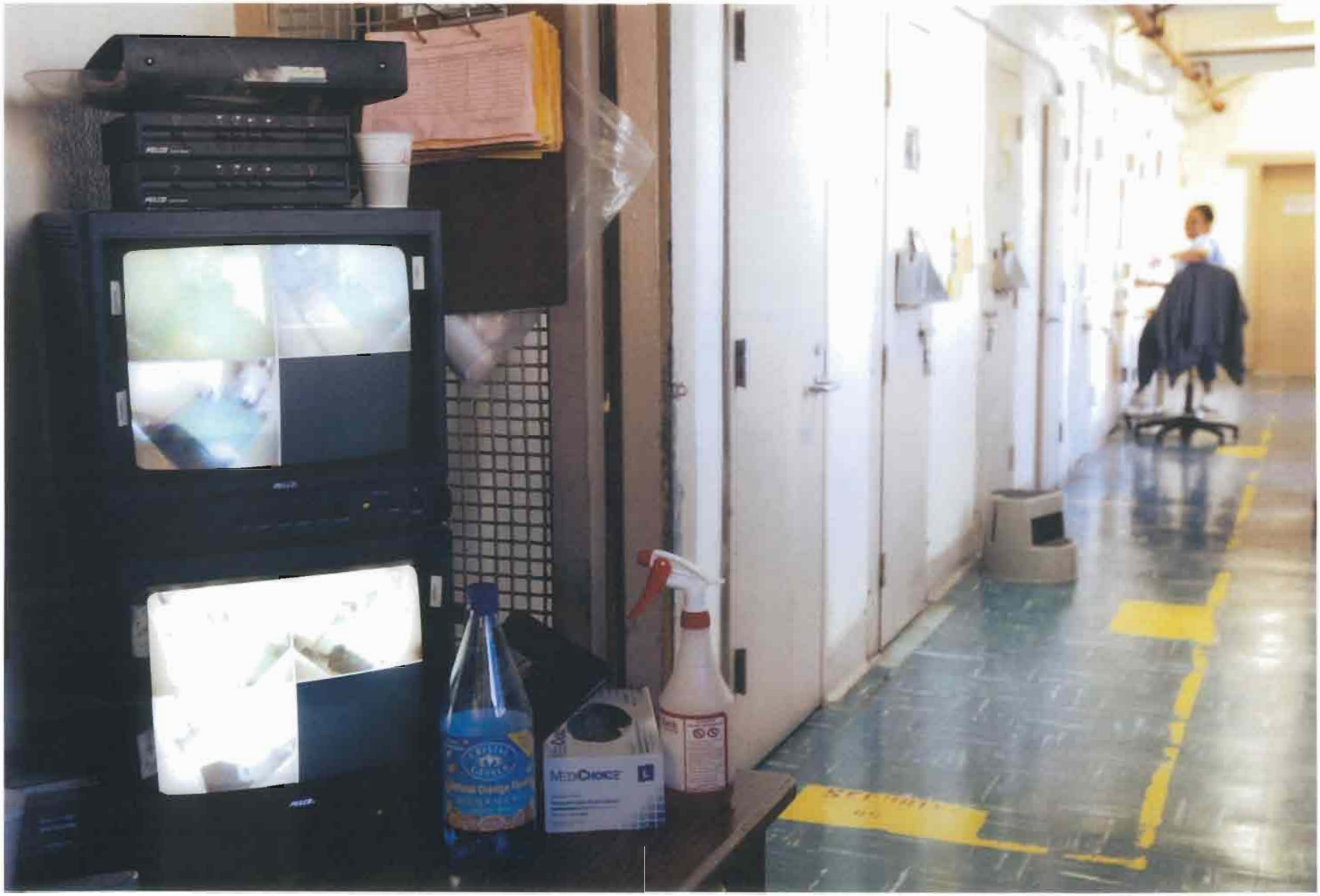
212

4M: A prisoner/patient receives oxygen through a locked cell port in the OHU.

EB 4/27

4N: Prisoner/patients in the OHU hallway.

4O: Suicide watch in the OHU. Note the prisoner/patient visible in the security camera (bottom left quadrant of top unit) talking to the medical staff member seated in the hall.


MEDCHOICE

4P: "Potty cage" in the OHU, where prisoners suspected of ingesting contraband are confined.

West Block Clinic

(photographs 4Q – 4R)

4Q: View into the West Block clinic, created from a converted sergeant's office.

BULLETIN
BOARD
US MAIL

4R: Interior of West Block clinic. Note the meager medical supplies and equipment.

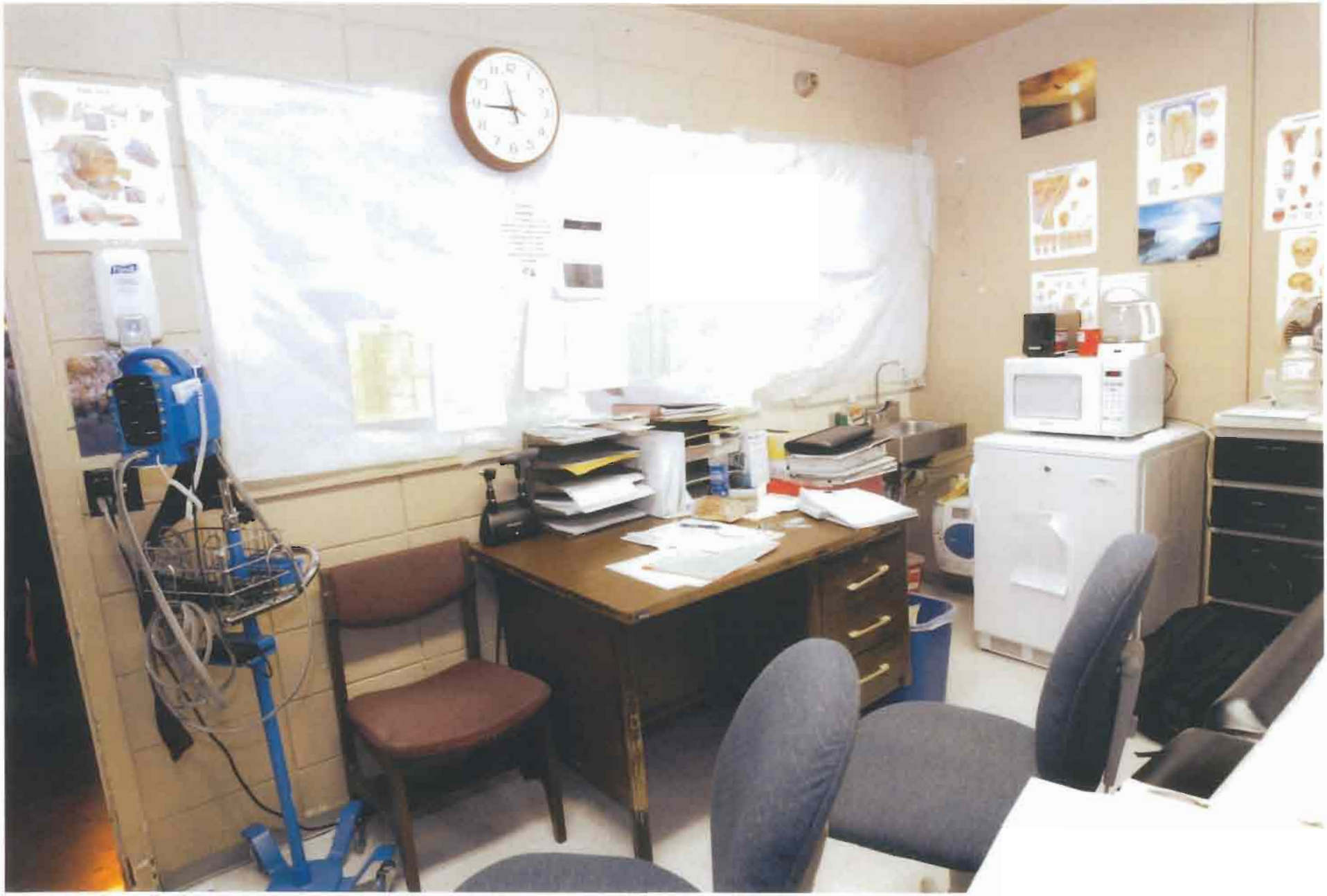
Watch

North Block Clinic

(photographs 4S – 4W)

4S: In North Block's cramped clinic. Paper over the window provides make-shift privacy in the exam room and a recently installed pump sink inhabits a far corner.

Crowded conditions force staff to use the exam table to stack patient charts (in foreground).



4T: A nurse interviews an inmate patient in North Block clinic's second room that serves as triage, pill call, records and staff work area.

STAFF
NORth Bio

4U: Medical records in the North Block clinic.

NORTH Block
FILE

4V: A pump-sink in North Block clinic exam room, which was not originally designed for medical purposes. Note the paper taped over the window for privacy.

dial

4W: Pipes with deteriorating protective covers hang overhead at the entrance to North Block clinic.

MEDICAL STAFF

Gymnasium/Housing Unit/Clinic

(photographs 5A – 5D)

5A: San Quentin's gymnasium houses more than 300 reception center inmates. To the right is an open shower and toilet area.

At the back of the gym is the clinic, accessed by walking alongside the showers and toilets or through the rows of bunks.

5B: Nurses in San Quentin's gym clinic work side by side in partial cubicles that offer little patient privacy.

5C: The toilet, cordoned off by portable dividers, sits a few feet away from the exam table in the gym clinic.

5D: Crowded living conditions in the gym.

PROOF OF SERVICE BY MAIL

I, Kristina Hector, declare:

I am a resident of the County of Alameda, California; that I am over the age of eighteen (18) years of age and not a party to the within titled cause of action. I am employed as the Inmate Patient Relations Manager to the Receiver in Plata v. Schwarzenegger.

On September 19, 2006 I arranged for the service of a copy of the attached documents described as APPENDIX OF PHOTOGRAPHS IN SUPPORT OF RECEIVER'S SECOND BI-MONTHLY REPORT on the parties of record in said cause by sending a true and correct copy thereof by pdf and by United States Mail and addressed as follows:

ANDREA LYNN HOCH
Legal Affairs Secretary
Office of the Governor
Capitol Building
Sacramento, CA 95814

PETER FARBER-SZEKRENYI, DR., P.H.
Director
Division of Correctional Health Care Services
CDCR
P.O. Box 942883
Sacramento, CA 94283-0001

J. MICHAEL KEATING, JR.
285 Terrace Avenue
Riverside, Rhode Island 02915

JONATHAN L. WOLFF
Deputy Attorney General
455 Golden Gate Ave., Suite 11000
San Francisco, CA 94102

STEVEN FAMA
DON SPECTER
ALISON HARDY
Prison Law Office
General Delivery
San Quentin, CA 94964-0001

PAUL MELLO
JERROLD SCHAEFER
Hanson Bridgett
425 Market Street, 26th Floor
San Francisco, CA 94105

BRUCE SLAVIN
General Counsel
CDCR-Office of the Secretary
P.O. Box 942883
Sacramento, CA 94283-0001

KATHLEEN KEESHEN
Legal Affairs Division
California Department of Corrections
P.O. Box 942883
Sacramento, CA 94283

RICHARD J. CHIVARO
JOHN CHEN
State Controller
300 Capitol Mall, Suite 518
Sacramento, CA 95814

MOLLY ARNOLD
Chief Counsel, Department of Finance
State Capitol, Room 1145
Sacramento, CA 95814

LAURIE GIBERSON
Staff Counsel
Department of General Services
707 Third Street, 7th floor, Suite 7-330
West Sacramento, CA 95605

MATTHEW CATE
Inspector General
Office of the Inspector General
P.O. Box 348780
Sacramento, CA 95834-8780

DONNA NEVILLE
Senior Staff Counsel
Bureau of State Audits
555 Capitol Mall, Suite 300
Sacramento, CA 95814

WARREN C. (CURT) STRACENER
PAUL M. STARKEY
Labor Relations Counsel
Department of Personnel Administration
Legal Division
1515 "S" Street, North Building, Suite 400
Sacramento, CA 95814-7243

GARY ROBINSON
Executive Director
UAPD
1330 Broadway Blvd., Suite 730
Oakland, CA 94612

YVONNE WALKER
Vice President for Bargaining
CSEA
1108 "O" Street
Sacramento, CA 95814

PAM MANWILLER
Director of State Programs
AFSME
555 Capitol Mall, Suite 1225
Sacramento, CA95814

RICHARD TATUM
CSSO State President
CSSO
1461 Ullrey Avenue
Escalon, CA95320

TIM BEHRENS
President
Association of California State Supervisors
1108 O Street
Sacramento, CA95814

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on September 19, 2006 at San Francisco, California.

Kristina Hector