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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

HOUSING IS A HUMAN RIGHT,  
et al.,

Case No. 8:19-cv-00388 PA JDE

Plaintiffs,

DECLARATION OF CAROL A. SOBEL  
IN SUPPORT OF A TEMPORARY  
RESTRAINING ORDER

v.

COUNTY OF ORANGE, et al.

Date: None  
Time: None  
Ctrm: 9A

Defendants.

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DECLARATION OF CAROL A. SOBEL

I, CAROL A. SOBEL, declare:


1. I am admitted to practice before the Supreme Court of California and the Central District of California, among other courts. I am one of the attorneys for Plaintiffs in this action. This declaration is based on facts of which I have personal knowledge. If called to testify to these facts, I could and would do so competently.

2. On June 20, 2019 I traveled to the camping site established by the Defendant City of San Clemente to inspect the area. I arrived there with my co-counsel Brooke Weitzman, Sarah Dawley, Ms. Weitzman’s associate, and two law students from her office. At the site, we met Monique Alarcon, an associate at my office, and three law students from my office, Allyssa Sheyer, Simon Shered and Yan Zhao. Also present was Maura Mikulec, a member of Plaintiff HHROC.

3. While at the site, I looked inside the toilets. The photographs attached to my declaration at Exhibits A and B are true and correct depictions of what I observed on June 20, 2019.

4. I observed a total of three toilets on the site. Two were together, near two dumpsters and a handwashing station as depicted in Exhibit F to the Scheyer Declaration. The third toilet was to my right as I faced the far side of the lot, with the entrance gate to my back. It was next to the area where I observed the security guard. I saw that it had a lock on it. Attached to my declaration at Exhibit C is a true and correct copy of the photograph I took on June 20, depicting the third toilet. It is my understanding based on discussion with several of the residents of the site that the third toilet was solely for use by the security guard.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 30<sup>th</sup> day of June, 2019 at Santa Monica, California.

  
CAROL A. SOBEL

**EXHIBIT A**



EXHIBIT B



EXHIBIT C

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