|  | Case 2:16-cv-00889-KJM-EFB Document  | 32 Filed 05/06/16 Page 1 of 2   |  |
|--|--|---|--|
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9  | Kevin T. Snider, State Bar No. 170988<br><i>Counsel of record</i><br>Michael J. Peffer, State Bar. No. 192265<br>Matthew B. McReynolds, State Bar No. 2347<br>PACIFIC JUSTICE INSTITUTE<br>P.O. Box 276600<br>Sacramento, CA 95827<br>Tel. (916) 857-6900<br>Email: ksnider@pji.org<br>Alexander M. Snyder (SBN 252058)<br>Life Legal Defense Foundation<br>P.O. Box 2015<br>Napa, CA 94558<br>Tel: 707.224.6675 | 797   |  |
| 10<br>11   | Attorneys for Plaintiff  |   |  |
| 12   |  |   |  |
| 13   | IN THE UNITED STATES DISTRICT COURT  |   |  |
| 14   | FOR THE EASTERN DISTRICT OF CALIFORNIA   |   |  |
| <ol> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> </ol> | Jonee Fonseca, an individual parent and<br>guardian of Israel Stinson, a minor,<br>Plaintiff,<br>Plaintiffs,<br>v.<br>Kaiser Permanente Medical Center<br>Roseville, Dr. Michael Myette M.D., Karen<br>Smith, M.D. in her official capacity as   | Case No.: 2:16-cv-00889 – KJM-EFB<br>DECLARATION OF JONEE FONSECA<br>REGARDING VIDEO RECORDING OF<br>ISRAEL STINSON |  |
| 22   | Director of the California Department of<br>Public Health and Does 2 through 10,<br>inclusive,   |   |  |
| 23   |  |   |  |
| 23<br>24   | Public Health and Does 2 through 10, inclusive,  | )<br>)<br>)   |  |
| 23<br>24<br>25   | Public Health and Does 2 through 10,   | )<br>)<br>)<br>)  |  |
| 23<br>24   | Public Health and Does 2 through 10, inclusive,  | )   |  |
| 23<br>24<br>25<br>26   | Public Health and Does 2 through 10, inclusive,  |   |  |
| 23<br>24<br>25<br>26<br>27   | Public Health and Does 2 through 10,<br>inclusive,<br>Defendants.  | )<br>)<br>)<br>F JONEE FONSECA  |  |

| 1        |   |  |
|----------|---|--|
| 2        | DECLARATION OF JONEE FONSECA  |  |
| 3        | I, Jonee Fonseca, am the plaintiff in the above-encaptioned case and if called upon,  |  |
| 4        | I could and would testify truthfully, as to my own person knowledge, as follows:      |  |
| 5        | 1. I am Israel Stinson's mother.  |  |
| 6        | 2. On May 3, 2016, I recorded two videos showing Israel's purposeful response         |  |
| 7        |   |  |
| 8        | to my voice alone, without me touching him. These videos are a true and correct       |  |
| 9        | representation of Israel's movements.   |  |
| 10<br>11 | 3. The videos are available at:   |  |
| 11       | https://youtu.be/rxOSv1DMyrI  |  |
| 13       | https://youtu.be/AzQTzPgKgXw  |  |
| 14       |   |  |
| 15       |   |  |
| 16       | I declare under penalty of perjury under the laws of the State of California that the |  |
| 17       | foregoing is true and correct. Executed this 6 <sup>th</sup> Day of May, 2016.        |  |
| 18       | <u>S/ Jonee Fonseca</u>   |  |
| 19       | Jonee Fonseca, Plaintiff  |  |
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| 28       | DECLARATION OF JONEE FONSECA  |  |
|          | -2-   |  |