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12 ROHRBACHER, MARCIA RAINES, KENT BASSO

13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA

16 SAUSALITO/MARIN COUNTY CHAPTER
OF THE CALIFORNIA HOMELESS UNION,
17 on behalf of itself and those it represents;
ROBBIE POWELSON; SHERI I. RILEY;
18 ARTHUR BRUCE; MELANIE MUASOU;
SUNNY JEAN YOW; NAOMI
19 MONTEMAYOR; MARK JEFF; MIKE
NORTH; JACKIE CUTLER and MICHAEL
20 ARNOLD on behalf of themselves and
similarly situated homeless persons,

21
22 Plaintiffs,

23 v.

24 CITY OF SAUSALITO; MAYOR JILL
JAMES HOFFMAN; POLICE CHIEF JOHN
25 ROHRBACHER; CITY MANAGER
MARCIA RAINES; DEPT. OF PUBLIC
26 WORKS SUPERVISOR KENT BASSO,
27 individually and in their respective official
capacities,

28 Defendants.

CASE NO. 3:21-cv-01143-LB

**DECLARATION OF MONTE DEIGNAN IN
SUPPORT OF DEFENDANTS' MOTION TO
MODIFY PRELIMINARY INJUNCTION**

Date: April 29, 2021
Time: 1:30 p.m.
Courtroom: 5-17th Floor

Action Filed: February 16, 2021
Trial Date: T.B.D.
Judge: Hon. Judge Edward M. Chen

1 DECLARATION OF MONTE DEIGNAN

2 I, Monte Deignan, declare as follows:

3 1. I am an environmental consultant, Cal OSHA certified asbestos consultant
4 (Consultant No. CAC 93-0879, 1993) and a California DHS certified lead inspector (Assessor No.
5 2599, 1995). I received a B.S. in Architecture from California Polytechnic State University, San
6 Luis Obispo in 1988. Additionally I have completed courses and training at University of
7 California, Berkeley (Extension Program) in AHERA inspection and management planning
8 (1988); NIOSH 582 airborne fiber analysis for asbestos training (1989); AHERA supervisor,
9 competent person training (1992); DOHS approved lead courses for inspector, supervisor (1995).

10 If called as a witness, I could and would competently testify to all facts stated herein based upon
11 my personal knowledge except where stated upon information and belief. This Declaration is
12 submitted in support of Defendants' Motion to Modify Preliminary Injunction.

13 2. Some of the representative projects I have worked on include (but are not limited
14 to) inspection and abatement oversight of numerous ships and maritime equipment work for
15 National Park Service as well as large ship yards in the East Bay; asbestos monitoring during
16 construction and demolition phases of the BART extension in Alameda and Contra Costa
17 counties; lead and asbestos inspections and abatement oversight during demolition and
18 construction work at San Francisco International Airport; and asbestos, lead inspections and
19 abatement oversight during demolition and construction work at County of Marin Public Works
20 facilities such as firehouses, libraries, and the Marin Civic Center.

21 3. On March 11, 2021, I performed inspection and testing at the lawn area of
22 Marinship Park in Sausalito, California to determine the presence or absence of environmental
23 contamination from the vessel abatement operations at the US Army Corp of Engineers (US ACE)
24 facility to the east of Marinship Park. I prepared a report documenting my findings, a true and
25 correct copy of is attached to Defendants' Index of Exhibits as **Exhibit 1**. A true and correct copy
26 of my CV is appended to my report.


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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this __ 8th __ day of April, 2021 in Larkspur, California.



Monte Deignan