

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MONTRELL CARR and QUINTIN SCOTT, individually and for a class,)	
)	
)	
<i>Plaintiffs,</i>)	
)	Case No. 17-cv-7135
v.)	
)	Hon. Martha M. Pacold
SHERIFF OF COOK COUNTY and COOK COUNTY, ILLINOIS)	
)	Magistrate Hon. David Weisman
)	
<i>Defendants.</i>)	

DECLARATION OF LAURA HERNANDEZ

I, Laura Hernandez, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, and if called upon to testify at trial, hearing, or deposition would state, based upon my personal knowledge, the following:

1. I am employed by Cermak Health Services, the Cook County Health operating unit that provides healthcare to detainees at the Cook County Jail (“Jail”). I am employed as a clerk at the Jail, and I have served in this capacity since approximately 2008.

2. One of my duties as a clerk is to schedule offsite movement requests and to schedule appointments at specialty clinics at the John H. Stroger, Jr. Hospital of Cook County (“Stroger”). As part of my duties, I expedite oral surgery referrals to Stroger’s Oral and Maxillofacial Surgery (“OMFS”) outpatient clinic when needed.

3. I expedite referrals to Stroger OMFS when a Cermak dentist determines that a detainee has an urgent condition that requires a sooner appointment than what is available through the routine oral surgery referral process.

4. For routine referrals to Stroger OMFS, I am not involved in the scheduling process because the scheduling department at Stroger schedules the appointment.

5. If a Cermak dentist determines that a detainee has an urgent condition and needs an expedited appointment at Stroger OMFS, the dentist may contact me, or first contact Dr. Jorelle Alexander who will then reach out to me, to escalate the referral to Stroger OMFS.

6. If a Cermak dentist reaches out to me to escalate a referral to Stroger OMFS, I will schedule an expedited appointment based on the instructions given to me by the dentist. For example, a dentist could tell me that the detainee needs to be seen that day, within two weeks, or any other time frame. If the detainee needs to be seen that day, I can schedule a same day appointment for the detainee to be seen by Stroger OMFS.

7. There has never been a time when I was unable to schedule an appointment within the time frame instructed by the dentist.

8. After reviewing detainee scheduling records, I provide the following examples where a detainee's referral to Stroger OMFS for oral surgery was escalated by me:

a. On 8/22/18, Dr. Fauzia Khan entered a referral order for oral surgery at Stroger OMFS for detainee Dishon Lowe (20180702044). On 8/23/18, Juana Macias scheduled Mr. Lowe an oral surgery appointment for 10/26/18. However, on 8/24/18, I rescheduled the oral surgery appointment to 8/27/18, and Mr. Lowe was seen at Stroger OMFS on that date.

b. On 7/18/18, Dr. Randy Rabin entered a referral order for oral surgery at Stroger OMFS for detainee Jason Cunningham (20180703246). On 7/19/18, Ms. Macias scheduled Mr. Cunningham an oral surgery appointment for 9/21/18. However, on 7/19/18,

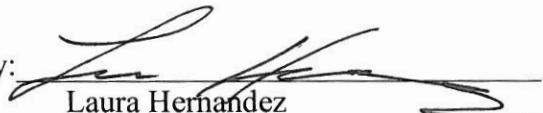
I rescheduled the oral surgery appointment to 7/26/18, and Mr. Cunningham was seen at Stroger OMFS on that date.

c. On 2/22/18, Dr. Rhay Street entered a referral order for oral surgery at Stroger OMFS for detainee Ryan Sykes (20160910119). On 2/22/18, Ms. Macias scheduled Mr. Sykes an oral surgery appointment for 3/30/18. However, on 2/23/18, I rescheduled the oral surgery appointment to 3/2/18, and Mr. Sykes was seen at Stroger OMFS on that date.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 3, 2020

By:



Laura Hernandez