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16	SUPERIOR COURT OF THE STATE OF CALIFORNIA		
17	COUNTY OF ALAMEDA		
18	LATRILL WILKERSON, DARRELL	Case No	
19	ROBINSON, STEVEN WOLVERTON, NATIONAL ASSOCIATION OF CRIMINAL	[PROPOSED] EX PARTE TEMPORARY	
20	DEFENSE LAWYERS, CALIFORNIA ATTORNEYS FOR CRIMINAL JUSTICE,	RESTRAINING ORDER AND ORDER TO SHOW CAUSE RE PRELIMINARY	
	and ACLU OF NORTHERN CALIFORNIA,	INJUNCTION	
21	Petitioners,		
22	VS.		
23			
24	GREGORY J. AHERN, Sheriff of Alameda County, in His Official Capacity, and DOES		
25	1-10,		
26	Respondents.		
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	PROPOSED ORDER FOR TEMPORARY RESTRAINING ORDER		

Based upon the Court's review of (i) the Verified Petition in this action, (ii) the Ex Parte
 Application of Petitioners Latrill Wilkerson, Darrell Robinson, Steven Wolverton, National
 Association of Criminal Defense Lawyers, California Attorneys for Criminal Justice, and the
 ACLU of Northern California for a Temporary Restraining Order and Order to Show Cause re
 Preliminary Injunction, (iii) Petitioners' Memorandum of Points and Authorities in Support of
 Application for Temporary Restraining Order and Order to Show Cause re Preliminary Injunction;
 (iv) and the accompanying exhibits, and upon sufficient cause being shown thereby:

8

OSC Re Preliminary Injunction

9 It is hereby ORDERED that Respondent Gregory J. Ahern is ordered to show cause in
10 writing on or before June _____, 2020, why a preliminary injunction should not issue restraining
11 and enjoining Respondent and his agents, employees, assigns, and all persons acting in concert
12 with him from violating the constitutional rights of Petitioners Latrill Wilkerson, Darrell
13 Robinson, Steven Wolverton, and the class of Medically Vulnerable people incarcerated at Santa
14 Rita Jail that Petitioners seek to represent, and requiring Respondent to:

a. Identify within twenty-four (24) hours of the Court's order all Medically
Vulnerable people (as defined in the Petition) then detained at Santa Rita
Jail along with a reasonably detailed explanation as to the method used to
identify the Medically Vulnerable people;

19b.Submit to the Court within three (3) days of the Court's order a list of the20identified Medically Vulnerable people whom Respondent does not intend21to release from custody or, where there are no less restrictive alternatives, to22home confinement along with detailed reasons for Respondent's decision;

- c. Release from custody or, where there are no less restrictive alternatives, to home confinement all identified Medically Vulnerable people for whom Respondent has not provided cause why release should not be granted; and
 d. Provide immediate COVID-19 testing to all Medically Vulnerable people incarcerated at the Santa Rita Jail.
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3 Order To Show Cause Re Preliminary I	ot later than, 2020. Hearing on the njunction is hereby set for, are to serve this Order on Respondent by .		
4 2020, in Department Petitioner	are to serve this Order on Respondent by		
5 2020			
5, 2020			
6			
Temporary Restraining Order			
It is FURTHER ORDERED that, pending the hearing on the Order To Show Cause Re			
Preliminary Injunction, Respondent and his agents, employees, assigns, and all persons acting in			
concert with him are restrained and enjoined from violating the constitutional rights of Petitioners			
Latrill Wilkerson, Darrell Robinson, Steven Wolverton, and the class of Medically Vulnerable			
people incarcerated at Santa Rita Jail that Petitioners seek to represent, and Respondent is required			
13 to:			
14a.Identify within two	venty-four (24) hours of the Court's order all Medically		
15 Vulnerable peop	e (as defined in the Petition) then detained at Santa Rita		
16 Jail along with a	reasonably detailed explanation as to the method used to		
17 identify the Med	cally Vulnerable people;		
18b.Submit to the Co	urt within three (3) days of the Court's order a list of the		
19 identified Medica	lly Vulnerable people whom Respondent does not intend		
20 to release from c	stody or, where there are no less restrictive alternatives, to		
21 home confineme	nt along with detailed reasons for Respondent's decision;		
22 c. Release from cu	stody or, where there are no less restrictive alternatives, to		
23 home confineme	nt all identified Medically Vulnerable people for whom		
24 Respondent has r	ot provided cause why release should not be granted; and		
25 d. Provide immedia	te COVID-19 testing to all Medically Vulnerable people		
26 incarcerated at th	e Santa Rita Jail.		
27			
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	-3-		
PROPOSED ORDER	PROPOSED ORDER FOR TEMPORARY RESTRAINING ORDER		

