

1 ERNEST GALVAN – 196065
KARA J. JANSSEN – 274762
2 ADRIENNE SPIEGEL – 330482
LUMA KHABBAZ – 351492
3 ROSEN BIEN
GALVAN & GRUNFELD LLP
4 101 Mission Street, Sixth Floor
San Francisco, California 94105-1738
5 Telephone: (415) 433-6830
Email: egalvan@rbgg.com
6 kjanssen@rbgg.com
aspiegel@rbgg.com
7 lkhabbaz@rbgg.com

8 SUSAN M. BEATY – 324048
CALIFORNIA COLLABORATIVE FOR
9 IMMIGRANT JUSTICE
1999 Harrison Street, Suite 1800
10 Oakland, California 94612-4700
Telephone: (510) 679-3674
11 Email: susan@ccijjustice.org

12 AMARIS MONTES*
Md. Bar No. 2112150205
13 MIRIAM R. NEMETH*
D.C. Bar No. 2112150205
14 RIGHTS BEHIND BARS
416 Florida Avenue N.W. #26152
15 Washington, D.C. 20001-0506
Telephone: (202) 455-4399
16 Email: amaris@rightsbehindbars.org
miriam@rightsbehindbars.org

17 * Admitted *pro hac vice*

18 Attorneys for Plaintiffs

19 UNITED STATES DISTRICT COURT

20 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

22 CALIFORNIA COALITION FOR WOMEN
PRISONERS et al.,

23 Plaintiffs,

24 v.

25 UNITED STATES OF AMERICA FEDERAL
BUREAU OF PRISONS et al.,

26 Defendants.

STEPHEN S. CHA-KIM*
N.Y. Bar No. 4979357
ARNOLD & PORTER KAYE SCHOLER LLP
250 West 55th Street
New York, New York 10019-9710
Telephone: (212) 836-8000
Email: stephen.cha-kim@arnoldporter.com

CARSON D. ANDERSON – 317308
ARNOLD & PORTER KAYE SCHOLER LLP
3000 El Camino Real
Five Palo Alto Square, Suite 500
Palo Alto, California 94306-3807
Telephone: (650) 319-4500
Email: carson.anderson@arnoldporter.com

NATALIE STEIERT*
D.C. Bar No. 90010655
ARNOLD & PORTER KAYE SCHOLER LLP
601 Massachusetts Avenue, N.W.
Washington, D.C. 20001-3743
Telephone: (202) 942-5000
Email: natalie.steiert@arnoldporter.com

Case No. 4:23-cv-04155-YGR

**DECLARATION OF KARA J.
JANSSEN IN SUPPORT OF
PLAINTIFFS’ UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF
PROPOSED CONSENT DECREE**

Date: December 17, 2024

Time: 2:00 p.m.

Crtrm.: 1, 4th Floor

Judge: Hon. Yvonne Gonzalez Rogers

Trial Date: June 23, 2025

1 I, Kara J. Janssen, declare:

2 1. I am an attorney duly admitted to practice before this Court. I am a Senior
3 Counsel in the law firm of Rosen Bien Galvan & Grunfeld LLP, counsel of record for
4 Plaintiffs and the Class. I have personal knowledge of the facts set forth herein, and if
5 called as a witness, I could competently so testify. I make this declaration in support of
6 Plaintiffs' Unopposed Motion for Preliminary Approval of the Proposed Consent Decree.

7 2. Following extensive settlement negotiations, the parties reached agreement
8 on a Proposed Consent Decree. **Exhibit 1** is a true and correct copy of the Proposed
9 Consent Decree.

10 3. **Exhibit 2** is a true and correct copy of the Proposed Notice to Class
11 Members.

12 4. Throughout the litigation of this case, the parties have been zealously
13 represented by experienced counsel. The Proposed Consent Decree, if approved by the
14 Court, will resolve all claims for injunctive relief raised in Plaintiffs' Complaint. In
15 contrast, additional litigation would involve uncertainty and delay for all parties and pose
16 significant risk.

17 I declare under penalty of perjury under the laws of the United States of America
18 that the foregoing is true and correct, and that this declaration is executed at San Francisco,
19 California this 6th day of December, 2024.

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/s/ Kara J. Janssen
Kara J. Janssen