

JESSE LASLOVICH
United States Attorney
MADISON L. MATTIOLI
MT Bar No. 36411284
ABBIE J.N. CZIOK
MT Bar No. 55781377
Assistant U.S. Attorneys
U.S. Attorney's Office
901 Front Street, Suite 1100
Helena, MT 59626
Phone: (406) 457-5269 – Madison
(406) 457-5268 – Abbie
Fax: (406) 457-5130
Email: madison.mattioli@usdoj.gov
abbie.cziok@usdoj.gov

Attorneys for Defendant
United States of America

Attorneys for Federal Defendants.

MARK STEGER SMITH
MT Bar No. 4160
TIMOTHY A. TATARKA
CA Bar No. 277219
Assistant U.S. Attorneys
U.S. Attorney's Office
James F. Battin Federal Courthouse
2601 2nd Ave. North, Suite 3200
Billings, MT 59101
Phone: (406) 247-4667 – Mark
(406) 247-4642
Fax: (406) 657-6058
Email: mark.smith3@usdoj.gov
timothy.tatarka@usdoj.gov

IN THE UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CALIFORNIA COALITION FOR WOMEN
PRISONERS; R.B.; A.H.R.; S.L.; J.L.; J.M.;
G.M.; A.S.; and L.T., individuals on behalf of
themselves and all others similarly situated,

Plaintiffs

v.

UNITED STATES OF AMERICA FEDERAL
BUREAU OF PRISONS, a governmental entity;
BUREAU OF PRISONS DIRECTOR
COLETTE PETERS, in her official capacity;
FCI DUBLIN WARDEN THAHESHA JUSINO,
in her official capacity; OFFICER
BELLHOUSE, in his individual capacity;
OFFICER GACAD, in his individual capacity;
OFFICER JONES, in his individual capacity;
LIEUTENANT JONES, in her individual
capacity; OFFICER LEWIS, in his individual
capacity; OFFICER NUNLEY, in his individual
capacity; OFFICER POOL, in his individual
capacity; LIEUTENANT PUTNAM, in his
individual capacity; OFFICER SERRANO, in
his individual capacity; OFFICER SHIRLEY, in
his individual capacity; OFFICER SMITH, in his
individual capacity; and OFFICER VASQUEZ,
in her individual capacity,

Defendants.

CASE NO. 4:23-CV-04155-YGR


DECLARATION OF ABBIE CZIOK

FILED UNDER SEAL

1 I, NAME, declare as follows:

- 2 1. My name is Abbie Cziok, and I am an attorney of record in the above captioned case representing
3 the United States.
- 4 2. On January 17, 2024, I contacted counsel for Plaintiffs to ask if they could stipulate to filing medical
5 records, sensitive institution management, and other private information under seal.
- 6 3. I have not received a response from counsel.

7
8 I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and
9 correct. Executed this 16th day of February 2024, at Helena, MT.

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12 ABBIE CZIOK
13 Assistant United States Attorney
14 District of Montana
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