

Exhibit 2

DECLARATION OF GREGORY ARRINGTON

I, Gregory Arrington, certify under penalty of perjury that the following statement is true and correct pursuant to 28 U.S.C. §1746.

1. My name is Gregory Arrington. I am 46 years old. I am currently incarcerated at the Metro West Detention Center in Miami, Florida in cell 3A4.
2. I have been in the jail since early March and in cell 3A4 since mid-March.
3. I have a rare kidney disease, which makes me concerned I could be at a heightened risk for COVID-19.
4. Charles Hobbs was housed in dorm 3A4 with me. He and I were trustees in our dorm and would clean the bathrooms together. Charles slept two bunks away from me in our dorm. I considered Charles a friend.
5. About four weeks ago, Charles became sick with a cough and congestion. After about two weeks of having those symptoms, Charles' condition deteriorated dramatically over the course of a week or a week and a half.
6. On at least three occasions, Charles had a high fever. I know this because a nurse came through the dorm to take his temperature periodically, and at least three times, the machine the nurse used to take Charles's temperature beeped and blinked a red light, which I believe means his temperature read over 100 degrees. The nurse who took Charles' temperature wrote down what his temperature was but did not take Charles to the medical clinic.
7. Charles became too weak to be able to get out of bed and had visible trouble breathing. Charles stopped eating during this time as well.
8. For at least one week while Charles' condition got dramatically worse, Charles did not receive any kind of medical attention aside from a nurse taking his temperature a few times. I believe Charles was too weak to take himself down to the medical clinic.
9. On Monday, April 27, Charles was very dizzy and looked like he was about to pass out, and a guard called for a wheelchair to take Charles to the medical clinic. A nurse took Charles down to the clinic in a wheelchair. After going to the clinic, Charles was sent straight outside to mandatory rec in the hot sun in the yard, where the rest of our dorm was. I thought it was cruel that Charles was forced to go outside in the heat given how weak Charles was.

10. The next day, on the morning of Tuesday, April 28, I saw Charles was gasping for breath in his bunk, and his eyes were rolling to the back of his head. It looked to me like Charles was unconscious, but his eyes were open.

11. I alerted a guard in my dorm that Charles was having a medical emergency. The guard called for medical attention and some guards and nurses came to our dorm.

12. When the medical staff was trying to take Charles out of our dorm, Charles began shaking violently in his bed. To me, it looked like Charles was having a seizure. The nurses had to hold Charles' body down to prevent him from falling out of his bunk bed. It was terrifying.

13. The medical staff took Charles out of our dorm on a stretcher. We did not see him again.

14. Yesterday, on May 2, a guard came into our dorm to collect some of Charles' property. Another guard then told us that Charles had died.

15. It was terrible to watch Charles' deteriorate each and every day. I am so anxious watching this crisis unfold in the jail. I want to leave this jail and be with my family, and particularly my grandchildren.

16. I'm not in this alone. There are thirty-plus other people in my dorm who are enduring this pandemic, who are scared, and who want to go home to their families.

This declaration was orally sworn to me by Gregory Arrington on May 3, 2020 over the telephone, because the Metro West Detention Center is currently closed to visitors due to the pandemic.

Under penalties of perjury, I declare that I have read the foregoing in its entirety to Gregory Arrington on May 3, 2020



Elizabeth Bou

Dated: May 3, 2020