

1 DAN SIEGEL, SBN 56400
ANNE BUTTERFIELD WEILLS, SBN 139845
2 EMILYROSE JOHNS, SBN 294319
3 SIEGEL, YEE, BRUNNER & MEHTA
4 475 14th Street, Suite 500
Oakland, California 94612
Telephone: (510) 839-1200
5 Facsimile: (510) 444-6698

6 Attorneys for Plaintiffs
7 CLARK SULLIVAN,
ADAM BREDENBERG,
8 and BENJAMIN ROYER

9 **UNITED STATES DISTRICT COURT**

10 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

11 CLARK SULLIVAN,
12 ADAM BREDENBERG,
and BENJAMIN ROYER

13 Plaintiffs,

14 vs.

15 CITY OF BERKELEY,

16 Defendant.

) Case No. 3:17-cv-06051-WHA

)

) **PLAINTIFF CLARK SULLIVAN'S**
) **DECLARATION IN SUPPORT OF**
) **PLAINTIFFS' MOTION TO RETAX**
) **COSTS**

)

) Date: August 29, 2019

) Time: 8:00 a.m.

) Judge: Hon. William H. Alsup

) Ctrm.: 12 - 19th Floor, 450 Golden Gate
Avenue, San Francisco, CA 94102

)

)

)

20 I, Clark Sullivan, declare as follows:

21 1. I am a 58-year-old homeless man living in the City of Berkeley. I live at an
22 encampment at the intersection of Adeline Street and 63rd Street in Berkeley,
23 California. I was a plaintiff in this lawsuit.

24 2. I have personal knowledge of all facts stated in this declaration, and if
25 called to testify, I could testify competently thereto.

26 3. I became homeless most recently on or around November 5, 2016.
27
28

1 4. I am currently unemployed and have been unemployed since September
2 of 2010.

3 5. I receive \$913 per month from Social Security Supplemental Income. This
4 is my only source of income.

5 6. My monthly expenses consist of \$60 for my phone, \$41 for a membership
6 at the YMCA where I shower and do physical therapy exercises, \$25 for a mailbox, \$74
7 for a bus pass, and approximately \$40 for coin-operated laundry. I spend
8 approximately \$400-500 on food per month.

9 7. I am disabled. COPD, diabetes, mobility issues stemming from a fall in
10 September of 2010.

11 8. My mobility impairment requires me to use a wheelchair to get around. I
12 am only able to walk a very limited distance, and I can only stand for limited periods of
13 time.

14 9. I have no outside family support, including outside family financial
15 support.

16 10. If I am forced to pay for the costs of this lawsuit, I will not be able to
17 afford food or pay my bills.

18
19 I declare under penalty of perjury under the laws of the United States that the
20 foregoing is true and correct. This declaration was executed on the 23rd day of July,
21 2019, at Oakland, California.

22
23 By: 
Clark Sullivan