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8 UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10 SOUTHERN DIVISION

11 ROBERT C. JORDAN, JR.,)

12 Plaintiff,)

13 vs.)

14 STATE OF CALIFORNIA, et al.,) No. 44786

15 Respondents.)
16)

17 AFFIDAVIT OF
18 WILLIAM THOMAS FRIEDRICK

19
20 WILLIAM THOMAS FRIEDRICK being first duly sworn, deposes and
21 says: I am a Correctional Sergeant assigned to "O" Wing at the
22 Correctional Training Facility at Soledad. My duties are to
23 assist in maintaining a high standard of cleanliness, and I am
24 responsible for the safekeeping, welfare, feeding and housing of
25 all inmates confined in "O" Wing. I have been assigned to "O"
26 Wing from June 1965 to the present time. My duty hours are
27 7:30 a.m. to 4:00 p.m. Monday through Friday. Plaintiff was
28 placed in a quiet cell in "O" Wing on the evening of July 9, 1965
29 and was removed from that cell on the morning of July 20, 1965.
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1 To the best of my knowledge the door and window flaps of plain-
2 tiff's cell were open all the time that I was on duty.

3 During my tour of duty the toilets in all the quiet cells,
4 including the cell where plaintiff was confined, were flushed
5 at least twice per shift. It is customary practice to flush the
6 toilets twice from 4:00 p.m. to midnight, and from midnight to
7 7:30 a.m., a prisoner's toilet is flushed at his request.
8

9 During the time in question all quiet cells were cleaned
10 every Saturday morning. The unoccupied cells were cleaned by
11 an inmate porter under the direct supervision of the Isolation
12 Officer. The occupants of the other quiet cells were furnished
13 materials to clean their own cells including a broom, cleansing
14 powder, either a mop or rags and water.
15

16 During the time in question, July 9, 1965 through July 20,
17 1965, when plaintiff was confined in the quiet cell, I personally
18 observed him take one shower and I believe he took a second shower
19 during this period. The general practice is that each quiet
20 cell prisoner is removed from his cell at the end of four or
21 five days and brought out for a shower, sooner if at all possible.
22

23 During the time in question each inmate housed in a quiet
24 cell was furnished at least two styrofoam drinking cups. At
25 least twice during the morning and afternoon shifts, each quiet
26 cell prisoner was given as much water as he cared to drink, in
27 addition to two cups of water which were left for him to either
28 drink later or wash with. During the midnight to 7:30 a.m. shift
29 each prisoner would be furnished water on request.
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1 Since the time in question, plastic wash bowls and one half
2 gallon water containers have been obtained and one of each of
3 these items is furnished to each quiet cell prisoner and they
4 are filled twice per shift.

5 Each quiet cell inmate is and during the time in question
6 was given one (1) canvas strong mattress blanket (6 feet 10½ inches
7 long and 5 feet and ¾ of an inch wide), (a photograph is
8 attached which shows the blanket folded double), one set of
9 underwear, one pair of coveralls, one pair of socks and one pair
10 of rubber sandals. Once a week the inmates of all units are given
11 clean bedding and clothing.

12 If sworn as a witness I could testify competently to the
13 above facts.

14
15
16 *William Thomas Friedrich*
17 WILLIAM THOMAS FRIEDRICK

18
19 Subscribed and sworn to before
20 me this 2nd day of May
A.D., 19 66.

21 *Warren G. Stone*
22 Notary Public in and for the
23 County of Monterey, State of
24 California.

25 WARREN G. STONE
My Commission Expires Jan. 26, 1970

