

EXHIBIT “B”

DECLARATION OF LUCIE HAISEN

I, Lucie Haisen, declare under penalty of perjury as follows:

1. I know the facts set forth in this declaration of my own knowledge and, if sworn

as a witness before this court or any other tribunal could and would competently testify thereto. I make this Declaration based on my own personal knowledge.


3. I am employed by the Los Angeles Unified School District (“LAUSD”) as a physical therapist. I have already had COVID-19 and tested positive on August 15, 2021.

4. Based on my religious beliefs, I am opposed to getting the COVID vaccine. I applied for a religious exemption, but LAUSD denied my request to be exempt from getting vaccinated. The District offered me the option to use my benefit time or remain on unpaid status (permissive leave), which is unacceptable. I am forced to use my benefit time, most of which is paid at only 50% of my salary. After those benefits are used up, I will be without any pay at all.

5. I am a member of the Health Freedom Defense Fund, Inc. and support its purpose and mission to rectify health injustice through education, advocacy and legal challenges to unjust mandates, laws and policies that undermine our health freedoms and human rights.

6. Although I could have filed a lawsuit on my own behalf, I am relying on the Health Freedom Defense Fund to represent me and protect my interests.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on this 3rd day of November, 2021 at Lakewood, (city) California.


Lucie Haisen

DECLARATION OF CARMEN HAWA

I, Carmen Hawa, declare under penalty of perjury as follows:

1. I know the facts set forth in this declaration of my own knowledge and, if sworn as a witness before this court or any other tribunal could and would competently testify thereto.

2. I am of sound mind and of the age of majority, and capable of testifying to the information sworn to herein.

3. I make this Declaration based on my own personal knowledge.

4. I am employed by the Los Angeles Unified School District (“LAUSD”) as a Speech Language Pathology Assistant.

5. I am being required by LAUSD to be vaccinated against COVID-19 as a condition of remaining employed by LAUSD. However, I am adamantly opposed to LAUSD’s mandatory vaccine requirement.

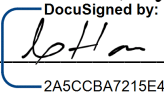
6. I applied for a personal belief exemption and was denied.

7. I value life and cannot agree to injecting anything into my body that was developed from or tested using aborted fetal tissue.

8. I am a member of the Health Freedom Defense Fund, Inc. and support its purpose and mission to rectify health injustice through education, advocacy and legal challenges to unjust mandates, laws and policies that undermine our health freedoms and human rights.

9. Although I could have filed a lawsuit on my own behalf, because I’m a member of the Health Freedom Defense Fund, I am relying on the Health Freedom Defense Fund to represent me and protect my interests.

I declare under penalty of perjury under the laws of The United States of America that the foregoing is true and correct and that this declaration was executed on this 11/3/2021, at Long Beach California (city), California (state).

Signature:  Printed Name: CARMEN HAWA

DocuSigned by:
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DECLARATION OF SCOTT BALIAN

I, Scott Balian, declare under penalty of perjury as follows:

1. I know the facts set forth in this declaration of my own knowledge and, if sworn as a witness before this court or any other tribunal could and would competently testify thereto.

2. I am of sound mind and of the age of majority, and capable of testifying to the information sworn to herein.

3. I make this Declaration based on my own personal knowledge.

4. I am employed by the Los Angeles Unified School District (“LAUSD”) as a Plant Manager.

5. I am being required by LAUSD to be vaccinated against COVID-19 as a condition of remaining employed. However, I am adamantly opposed to LAUSD’s mandatory vaccine requirement.

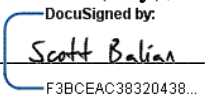
6. I applied for a religious exemption; however, I was not provided with a response to that request.

7. I am not anti-vaccination, per se, but I also have concerns about the lack of data on the short and long-term safety of the COVID vaccines.

8. I am a member of the Health Freedom Defense Fund, Inc. and support its purpose and mission to rectify health injustice through education, advocacy and legal challenges to unjust mandates, laws and policies that undermine our health freedoms and human rights.

9. Although I could have filed a lawsuit on my own behalf, because I’m a member of the Health Freedom Defense Fund, I am relying on the Health Freedom Defense Fund to represent me and protect my interests.

I declare under penalty of perjury under the laws of The United States of America that the foregoing is true and correct and that this declaration was executed on this 11/2/2021, at west Hills (city), California (state).

Signature:  Printed Name: Scott Balian
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DECLARATION OF NICOLE PEREZ BRAVATTI

I, Nicole Perez Bravatti, declare under penalty of perjury as follows:

1. I know the facts set forth in this declaration of my own knowledge and, if sworn as a witness before this court or any other tribunal could and would competently testify thereto. I make this declaration based on my own personal knowledge.
3. I am employed by the Los Angeles Unified School District (“LAUSD”) as a Healthcare Assistant. I have worked for LAUSD for approximately 23 years.
4. I have already had COVID-19 and tested positive on or about mid October 2021.
5. Based on my religious beliefs, I am opposed to getting the COVID vaccine. I applied for a religious exemption through my employer. While LAUSD granted my request, they did not grant me any accommodations. I am currently on unpaid leave status and am not receiving any income from LAUSD.
6. I am a member of the Health Freedom Defense Fund, Inc. and support its purpose and mission to rectify health injustice through education, advocacy and legal challenges to unjust mandates, laws and policies that undermine our health freedoms and human rights.
7. Although I could have filed a lawsuit on my own behalf, I am relying on the Health Freedom Defense Fund to represent me and protect my interests.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on this 3rd day of November, 2021 at Los Angeles, California.



Nicole Perez Bravatti