

1 DENNIS J. HERRERA, State Bar #139669
 City Attorney
 2 JESSE C. SMITH, State Bar #122517
 Chief Assistant City Attorney
 3 RONALD P. FLYNN, State Bar #184186
 Chief Deputy City Attorney
 4 YVONNE R. MERÉ, State Bar #173594
 Chief of Complex and Affirmative Litigation
 5 SARA J. EISENBERG, State Bar #269303
 JAIME M. HULING DELAYE, State Bar #270784
 6 Deputy City Attorneys
 City Hall, Room 234
 7 1 Dr. Carlton B. Goodlett Place
 San Francisco, California 94102-4602
 8 Telephone: (415) 554-4633
 Facsimile: (415) 554-4715
 9 E-Mail: sara.eisenberg@sfcityatty.org

10 *Attorneys for Plaintiff*
 CITY AND COUNTY OF SAN FRANCISCO

11 IN THE UNITED STATES DISTRICT COURT
 12 FOR THE NORTHERN DISTRICT OF CALIFORNIA

14 CITY AND COUNTY OF SAN FRANCISCO,
 15 Plaintiff,
 16 vs.
 17 ALEX M. AZAR II, et al.,
 18 Defendants.

No. C 19-02405 WHA
 Related to
 No. C 19-02769 WHA
 No. C 19-02916 WHA

**DECLARATION OF RON WEIGELT IN
 SUPPORT OF PLAINTIFFS' MOTION
 FOR SUMMARY JUDGMENT AND IN
 SUPPORT OF THEIR OPPOSITION TO
 DEFENDANTS' MOTION TO DISMISS
 OR, IN THE ALTERNATIVE, FOR
 SUMMARY JUDGMENT**

19 STATE OF CALIFORNIA, by and through
 ATTORNEY GENERAL XAVIER BECERRA,
 20 Plaintiff,
 21 vs.
 22 ALEX M. AZAR, et al.,
 23 Defendants.

Date: October 30, 2019
 Time: 8:00 AM
 Courtroom: 12
 Judge: Hon. William H. Alsup
 Action Filed: 5/2/2019

24 COUNTY OF SANTA CLARA et al,
 25 Plaintiffs,
 26 vs.
 27 U.S. DEPARTMENT OF HEALTH AND
 HUMAN SERVICES, et al.,
 28 Defendants.

1 I, Ron Weigelt, declare as follows:

2 1. I have personal knowledge of the facts set forth in this declaration and, if called as
3 a witness, could and would testify competently to the matters set forth below.

4 2. I am the Director of Human Resources for the San Francisco Public Health
5 Department (“SFDPH”). I have served in this role since 2013.

6 3. SFDPH is the largest department in the City and County of San Francisco with
7 approximately 8,000 staff. In addition, more than 2,000 University of California, San Francisco
8 (“UCSF”) physicians and staff work at Zuckerberg San Francisco General Hospital pursuant to an
9 affiliation agreement between SFDPH and the Regents of the University of California.

10 4. San Francisco’s Memorandums of Understanding with its nurses and supervising
11 nurses—represented by Service Employees International Union (“SEIU”) Local 1021—contain
12 conscientious objection clauses, which state:

13 The rights of patients to receive quality nursing care are to be respected.

14 It is recognized that Registered Nurses hold certain moral, ethical and religious
15 beliefs and in good conscience may be compelled to refuse involvement with
16 abortions and other procedures involving ethical causes.

17 Situations will arise where the immediate nature of the patient’s needs will not allow
18 for personnel substitutions. In such circumstances the patient’s right to receive the
19 necessary nursing care will take precedence over exercise of the nurse’s individual
20 beliefs and rights until other personnel can be provided.

21 I declare under penalty of perjury that the foregoing is true and correct and that this
22 declaration was executed on September 9, at San Francisco, California.

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24 Ron Weigelt

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