

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  
 Chief of Strategic Advocacy  
 6 JAIME M. HULING DELAYE, State Bar #270784  
 Deputy City Attorney  
 7 City Hall, Room 234  
 8 1 Dr. Carlton B. Goodlett Place  
 9 San Francisco, California 94102-4602  
 Telephone: (415) 554-4633  
 10 Facsimile: (415) 554-4715  
 11 E-Mail: sara.eisenberg@sfcityatty.org

12 Attorneys for Plaintiff  
 CITY AND COUNTY OF SAN FRANCISCO

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 15 UNITED STATES DISTRICT COURT  
 16 NORTHERN DISTRICT OF CALIFORNIA

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 18 CITY AND COUNTY OF SAN  
 FRANCISCO,

19 Plaintiff,

20 vs.

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 22 ALEX M. AZAR II, Secretary of U.S.  
 Department of Health and Human Services;  
 23 ROGER SEVERINO, Director, Office for  
 Civil Rights, Department of Health and Human  
 24 Services; U.S. DEPARTMENT OF HEALTH  
 AND HUMAN SERVICES; and DOES 1-25,

25 Defendants.  
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Case No. 3:19-cv-2405-JCS

**DECLARATION OF RON WEIGELT IN  
 SUPPORT OF CITY AND COUNTY OF SAN  
 FRANCISCO'S MOTION FOR  
 PRELIMINARY INJUNCTION**

Hearing Date: July 12, 2019  
 Time: 10:30 a.m.  
 Judge: Hon. Joseph C. Spero  
 Place: Courtroom G, 15th Floor  
 Trial Date: Not set

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 a  
3 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 Department  
5 (“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.

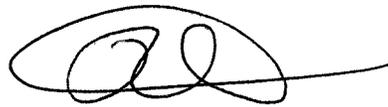
10 4. San Francisco’s Memorandums of Understanding with it nurses and supervising  
11 nurses—represented by Service Employees International Union (“SEIU”) Local 1021—contain  
12 conscientious objection clauses, which state:

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  
18 allow for personnel substitutions. In such circumstances the patient’s right to  
19 receive the necessary nursing care will take precedence over exercise of the  
20 nurse’s individual 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 declaration  
22 was executed on June 3, at San Francisco, California.



23 Ron Weigelt  
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