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

11 IN THE UNITED STATES DISTRICT COURT  
 12 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 13

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.

23 

24 Ron Weigelt