UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

JOSEPH SCLAFANI, MICHAEL FEINSTEIN, and BRET CAPPOLA,

Plaintiffs,

CAROL A. MICI, in her official capacity as Commissioner of the Massachusetts Department of Corrections,

DOUGLAS DEMOURA, in his official capacity as Superintendent of MCI-Cedar Junction, and STEVE SILVA, in his official capacity as Superintendent of MCI-Norfolk,

Defendants.

C.A. No.

DECLARATION OF JONATHAN HOWLETT

Pursuant to 28 U.S.C. § 1746, I, Jonathan Howlett, declare as follows:

- 1. I am 38 years old. I am currently incarcerated at MCI-Cedar Junction.
- I have been diagnosed with opioid use disorder. I have been prescribed buprenorphine to treat my opioid use disorder. I have been in the buprenorphine program at MCI-Cedar Junction since early October, 2019.
- 3. My doctor in the community prescribed me 22 mg of buprenorphine per day to treat my opioid use disorder.
- 4. Dr. Hameed, the doctor at Cedar Junction, prescribed me only 4 mg of buprenorphine per day.
- 5. Dr. Hameed told me nobody at Cedar Junction is allowed to get more than 8 mg per day of buprenorphine.
- Dr. Hameed also told me that Cedar Junction will only provide buprenorphine for a maximum of 90 days.
- 7. I wrote to the Superintendent of Cedar Junction asking to be able to stay on my medication. I received a written response on November 8, 2019 from Jodi Hockert-Lotz, the Deputy Superintendent. She wrote: "At this time the treatment program is offered to inmates for their first 90 days of incarceration and is available as part of an inmates release to the community."
- 8. My buprenorphine prescription is set to be discontinued on January 6, 2019. I am desperate to stay on my lifesaving medication.
- 9. So that I can receive medication for addiction treatment while incarcerated, I would like to serve the remainder of my sentence at the Franklin County House of Correction. It is my

Case 1:19-cv-12550 Document 24 Filed 12/19/19 Page 3 of 3

understanding that the Superintendent and Medical Director at Franklin County House of
Correction have agreed to take me, because they want me to be able to stay on my
medication, and that they have communicated this information to the Department of
Correction. I am currently waiting for the Department of Correction to approve the transfer.

Executed on December 18, 2019

Jonathan Howlett