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8 Attorneys for Plaintiff Daymon Johnson

9 UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF CALIFORNIA

11 DAYMON JOHNSON,

12 *Plaintiff,*

13 v.

14 STEVE WATKIN, et al.,

15 *Defendants.*

Case No. 1:23-cv-00848-CDB

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18 DECLARATION OF MATTHEW GARRETT

19 I, Matthew Garrett, declare the following based on my personal knowledge:

20 1. I was employed as full-time faculty at Kern Community College District beginning
21 in August 2010.

22 2. On November 21, 2022, Bakersfield College Dean of Instruction Richard McCrow
23 sent me a letter titled, "Notice to Correct Deficiencies – Unprofessional Conduct." Exhibit F is a
24 true and correct copy of that letter, with my home address redacted.

25 3. On April 14, 2023, former Bakersfield College President Zav Dadabhoy sent me a
26 letter entitled "Notice of Decision to Terminate," including a "Recommendation for Statement of
27 Decision to Terminate" and "Statement of Charges." Exhibit G is a true and correct copy of that
28 letter and its attachments, with my home address redacted.

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I declared under penalty of perjury that the foregoing is true and correct.

Executed on June 30, 2023.


Matthew Garrett