

1 Mr. Allison Barton Rice
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2 Austin, TX 78750
3 PH: (415) 579-8208
allisonbartonrice@mac.com

4 Plaintiff, in propria persona

5 UNITED STATES DISTRICT COURT

6 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

8 ALLISON BARTON RICE, an individual,

CASE NO. 19-cv-04250 LB

9 Plaintiff,

**DECLARATION OF ALISON
LUDWIG, MD IN SUPPORT OF
PLAINTIFF'S CLAIMS IN CASE
NO. 19-CV-04250 LB, U.S.
DISTRICT COURT, NORTHERN
CALIFORNIA DISTRICT**

10 v.

12 THE CITY AND COUNTY OF SAN
FRANCISCO; LONDON BREED, MAYOR
13 OF THE CITY OF SAN FRANCISCO;
KATE HARTLEY, DIRECTOR OF THE
14 SAN FRANCISCO MAYOR'S OFFICE OF
HOUSING AND COMMUNITY
15 DEVELOPMENT; MARIA BENJAMIN,
DIRECTOR OF HOMEOWNERSHIP &
16 BELOW MARKET RATE PROGRAMS
SAN FRANCISCO MAYOR'S OFFICE OF
17 HOUSING AND COMMUNITY
DEVELOPMENT; CISSY YIN,
18 HOMEOWNERSHIP & BELOW MARKET
RATE PROGRAMS COMPLIANCE
19 MANAGER SAN FRANCISCO MAYOR'S
OFFICE OF HOUSING AND
20 COMMUNITY DEVELOPMENT; DENNIS
HERRERA, SAN FRANCISCO CITY
21 ATTORNEY; KEITH NAGAYAMA, SAN
FRANCISCO CITY DEPUTY ATTORNEY
22 and DOES 1 through 50,

Hearing Date:

Time:

Place: 450 Golden Gate Ave.
Courtroom B, 15th Fl
San Francisco, CA
94102

Trial Date: Not Set

23 Defendants.

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28 I, Alison Ludwig, MD declare as follows:
ALLISON BARTON RICE v. THE CITY AND COUNTY OF SAN FRANCISCO, et al.
Case No. 19-cv-04250 LB

Declaration of Alison Ludwig, MD in Support of Plaintiff's Claims in Case No. 19-cv-04250 LB

1 1. I am Mr. Rice's primary care physician at the San Francisco VA Medical Center
2 (SFVAMC). Mr. Rice has been a patient at the SFVAMC since 1995. He is a 100% service
3 connected disabled veteran for 'Depression, Paranoid Schizophrenia' and has been a long-time
4 recipient of mental health services through the VA medical care system.

5 2. In a letter dated September 19, 2017 and mailed to the San Francisco Mayor's
6 Office of Housing and Community Development, I stated: "For Mr. Rice's mental health, and
7 considering his disabled veteran status, I strongly recommend from a medical perspective that
8 his request to have roommates and to be allowed travel be approved."

9 3. My use of the word "roommates" meant rent-paying roommates.

10 4. It was not my recommendation that Mr. Rice take in non rent-paying roommates.

11 5. I declare under penalty of perjury that the foregoing is true and correct.

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13 Dated: December 18, 2019

Respectfully Submitted,

14 By: 

15 Alison Ludwig, MD
16 Physician Chief, Medical Practice
17 San Francisco VA Medical Center
4150 Clement St.
San Francisco, CA 94121

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Page2