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12 MULTIDISCIPLINARY ASSOCIATION
13 FOR PSYCHEDELIC STUDIES, INC.
14 a.k.a. MAPS, INC.

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Superior Court of California,
County of Monterey
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9 **SUPERIOR COURT OF CALIFORNIA**
10 **FOR THE COUNTY OF MONTEREY**

12 CARLA GATLIN and SUSAN YBARRA-
13 TELIAS, Individually and as Successors-In-
14 Interest of decedent Baylee Ybarra Gatlin,

15 Plaintiffs,

16 v.

17 DO LAB INC.; MULTIDISCIPLINARY
18 ASSOCIATION FOR PSYCHEDELIC
19 STUDIES, INC. a.k.a. MAPS, INC.; ZENDO
20 PROJECT, a business entity form unknown;
21 RGX MEIDCAL, a business entity form
22 unknown; RICHARD GOTTLIEB, an
23 individual; and DOES 1 to 20, inclusive,

24 Defendants.

CASE NO. **20CV002753**

**DECLARATION OF SARA GAEL GIRON
IN SUPPORT OF MULTIDISCIPLINARY
ASSOCIATION FOR PSYCHEDELIC
STUDIES, INC. A.K.A. MAPS, INC.'S
MOTION FOR SUMMARY JUDGMENT
/ADJUDICATION**

Accompanying Documents:

Notice of Motion and Motion for Summary
Judgment/Adjudication; Separate Statement;
Memo of Law; Declaration of Counsel;
[Proposed] Order

Date: March 18, 2022

Time: 8:30 a.m.

Dept.: 15

Reservation I.D.:

Action Filed: May 21, 2018

Trial Date: May 16, 2022

25 I, Sara Gael Giron, declare as follows:

26 1. I am the Director of Harm Reduction for defendant Multidisciplinary Association
27 for Psychedelic Studies, Inc. ("MAPS.") This declaration is being submitted in support of
28 MAPS' Motion For Summary Judgment/Adjudication in the above-entitled action. I have

1 personal knowledge of the matters set forth herein and if called as a witness, could and would
2 testify competently thereto.

3 2. MAPS is a non-profit organization that has acted in a harm reduction capacity at
4 music festivals under the name the Zendo Project since 2012.

5 3. MAPS' Zendo Project provides psychedelic harm reduction services aimed at
6 preventing and transforming difficult experiences while in a non-ordinary state of
7 consciousness.

8 4. Harm reduction is a set of principles and practices that aims to reduce or mitigate
9 the risks of substance use.

10 5. MAPS recognizes that taking psychedelics can result in overwhelming and
11 uncomfortable experiences, more likely with high doses, amongst first-time users, and without
12 adequate preparation or setting.

13 6. MAPS was not compensated for the harm reduction services it offered through the
14 Zendo Project at Lightning in a Bottle ("LiB"). Rather, Do Lab, Inc. made a modest \$5,000
15 donation to MAPS.

16 7. The harm reduction services at the 2017 LiB festival were offered at two different
17 Zendo tents which were staffed by peer volunteers, including "sitters" who would sit with
18 concert-goers who came into the Zendo tent generally, because they were having difficult
19 psychedelic experiences.

20 8. MAPS did not provide medical services to festival attendees/concert goers at the
21 2017 LiB festival.

22 9. As one of the supervisors for MAPS at the festival, I observed Baylee Gatlin
23 ("Decedent") in the Zendo tent at the LiB on the evening of May 27, 2017, starting when the
24 RGX medical team brought her into the Zendo tent, which was adjacent to the Medical tent and
25 throughout the evening. Each time I observed her after she arrived, Decedent was laying down
26 and appeared to be resting comfortably.

27 10. I began as a volunteer for the Zendo Project at various music festivals in 2012. I
28 became MAPS' Harm Reduction Training and Education Coordinator in 2013. In late 2016, I

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1 reached my current position as Director of Harm Reduction. In my various positions, I have
2 had personal knowledge of the events and occurrences that have taken place relating to the
3 Zendo Project. MAPS performs post event debriefings and interviews to determine best
4 practices and supplementing out training. I have been a key part of developing MAPS' harm
5 reduction program (the Zendo Project) and training. I provided two depositions at plaintiffs'
6 request in this case, and I am MAPS most knowledgeable person with regards to harm reduction.

7 11. Since its inception in 2012 and in all the time up until Decedent's passing on May
8 28, 2017, where MAPS has provided harm reduction assistance at music festivals, to my
9 understanding MAPS has never received any notice that a person who visited a Zendo Project
10 tent has died or suffered significant illness or injury as a result of harm reduction assistance
11 provided by MAPS or its volunteers.

12 I declare under penalty of perjury under the laws of the State of California that the
13 foregoing is true and correct.

14 Dated: January 31, 2022


Sara Gael Giron

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