

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

DWAYNE LAW, JR.,
Inmate No. 1585287;

Plaintiff,

v.

DAVID ZOOK, Baskerville Correctional
Center Warden, in his official capacity only;

ROBERT WHITT, Baskerville Correctional
Center Assistant Warden, in his official
capacity only; and

CAPTAIN L. BUTCHER (First Name
Unknown), Baskerville Correctional Center
Officer, in his official capacity only;

Defendants.

Civil Action No.

DECLARATION OF CHRISTOPHER GODSHALL-BENNETT

Christopher Godshall-Bennett, an attorney duly admitted to practice law before the Courts of Washington, D.C., declares the following to be true under the penalty of perjury:

1. I am a Legal Fellow at Muslim Advocates, co-counsel for the Plaintiff, and, as such, I am fully familiar with the facts and circumstances of this matter based upon a review of the file in my office.
2. I submit this Declaration in support of Plaintiff's Emergency Motion for Temporary Restraining Order and/or Preliminary Injunction.
3. As explained herein, I provided Defendants with the requisite notice as required pursuant to Federal Rule of Civil Procedure 65(b).

April 21, 2022 Letter to Warden Zook

4. On April 21, 2022, I wrote to Warden Zook of the Baskerville Correctional Center (hereinafter “Baskerville”) to notify him that Muslim Advocates was informed that officials at his facility were denying Mr. Dwayne Law, Jr. (hereinafter “Plaintiff”) accommodations for his Ramadan fast.
5. In my letter to Warden Zook, I requested that he begin accommodating Mr. Law’s fast immediately and improve oversight of the Ramadan accommodations provided to inmates at Baskerville.
6. In addition, I requested a prompt response and provided my contact information so that we could arrive at a mutually agreed upon resolution.

April 21, 2022 Letter to Margaret O’Shea

7. A copy of my April 21, 2022 Letter to Warden Zook was forwarded to Ms. Margaret O’Shea, Counsel at the Virginia Department of Corrections the same day.
8. As of April 25, 2022, neither Warden Zook nor Ms. O’Shea have responded. As such, the Plaintiff continues to be deprived of his rights to a religious accommodation during Ramadan.

Legislative Outreach

9. At my direction, my office contacted Delegate Patrick Hope of the Virginia House of Delegates on April 22, 2022, to solicit help in resolving this matter.
10. It is our understanding that staff at Delegate Hope’s office reached out to Virginia Department of Corrections officials on April 24, 2022, in an effort to rectify this matter.
11. Similarly, as of April 25, 2022, neither my colleagues nor I have been informed of a response to Delegate Hope’s inquiry into the Plaintiff’s matter.
12. At my direction, my office contacted Senator Mark Warner of the United States Senate on April 22, 2022, to solicit help in resolving this matter.

13. It is our understanding that staff at Senator Warner's office reached out to Virginia Department of Corrections officials on April 22, 2022, in an effort to rectify this matter.

14. Similarly, as of April 25, 2022, neither my colleagues nor I have been informed of a response to Senator Warner's inquiry into the Plaintiff's matter.

Informing Defendants of Present Action

15. On April 25, 2022, I emailed a copy of the Verified Complaint and Plaintiff's Motion for a Temporary Restraining Order to Warden Zook and Ms. O'Shea.

I declare under penalty of perjury that the foregoing is accurate to the best of my knowledge.

Christopher Godshall-Bennett
Signature

April 25, 2022
Date