

EXHIBIT B-9

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MARANDA LYNN O'DONNELL,	§	
<i>et al</i>	§	
	§	
Plaintiffs,	§	
	§	CIVIL ACTION NO. 4:16-CV-01414
	§	
v.	§	
	§	
HARRIS COUNTY, TEXAS, et al	§	
	§	
Defendants.	§	

DECLARATION OF KIKI TEAL

1. My name is Kiki Teal. I serve at CEO for Harris Health Correctional Health. The facts set forth are based on my personal knowledge. I am over 18 years of age.
2. Harris Health provides the medical care to detainees in the Harris County Jail, which includes a full medical clinic located in the Joint Processing Center (JPC).
3. The medical clinic located within the JPC is staffed by employees of Harris Health or providers contracted with Harris Health to provide medical screening of arrestees who are being processed at the JPC.
4. The JPC operates 24/7, 365 days a year and is staffed at all times.
5. Currently, Harris Health has 74 people in various roles working in the JPC medical clinic. This staffing level is based on current needs as of September 2026.
6. If the JPC received an additional 77 arrestees brought into custody each day, I estimate Harris Health would need 17 additional staff members to serve the needs in the medical intake clinic in the JPC. Also, with increased patient load, Harris Health would need more equipment, supplies and pharmaceuticals, as well as additional clinic space.
7. The estimated cost for these additional 17 staff members, not including associated equipment, supplies and pharmaceuticals, would be \$4.4 million per year.

8. I reserve the right to amend this estimate.

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

Kiki Teal

Kiki Teal

Sworn to and subscribed before me by on 16th day of September, 2026.

[Signature]

NOTARY PUBLIC – STATE OF TEXAS

