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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT FOR
 THE CENTRAL DISTRICT OF CALIFORNIA**

MATTHEW BRACH, et al.

Plaintiffs,
 v.

GAVIN NEWSOM, et al.
 Defendants.

Case No.: 2:20-CV-06472-SVW-AFM

**SUPPLEMENTAL DECLARATION
 OF DR. JAYANTA BHATTACHARYA
 IN SUPPORT OF APPLICATION
 FOR TEMPORARY RESTRAINING
 ORDER**

Judge: Hon. Stephen V. Wilson
 Courtroom: 10A

1 Jayanta Bhattacharya declares, pursuant to 28 U.S.C. § 1746:

2 1. I am a resident of Los Altos, California, I am 52-years-old, and I am
3 competent to render this declaration.

4 2. I previously filed a declaration in this case in support of Plaintiff's
5 application for a temporary restraining order, and my background and education are
6 detailed in that declaration. *See* Dkt. 28-3 ¶¶ 2–15.

7
8 **New Scientific Evidence Confirms that School Closures are Harmful**
9 **to Children and the Risk of Child Transmission and Infection is**
10 **Negligible**

11 3. Since my initial declaration in this case, I have identified several new
12 studies related to the safety of school reopening. All of this evidence confirms the
13 major thesis of my declaration – opening schools can be done safely, children play a
14 negligible role in disease spread to adults, and the mortality risk from COVID-19
15 infection is small in children.

16 4. One of the largest studies in the world on coronavirus in schools, carried
17 out in 100 institutions in the UK, recently confirmed that “there is very little evidence
18 that the virus is transmitted” in schools.¹ Indeed, the president of the Royal College of
19 Pediatrics and Child Health and a member of the government advisory group Sage
20 confirmed that “there is very little evidence that the virus is transmitted in schools”
21 based on this extensive study. *Id.*

22 5. A study of 23 family disease clusters in Greece, published on Aug. 7th in
23 the *Journal of Medical Virology*, found that in 91% of the clusters, an adult was the first
24 person to be infected. Their contact tracing effort attempted to clarify the direction of
25 disease spread by careful questioning about the relative timing of the development of

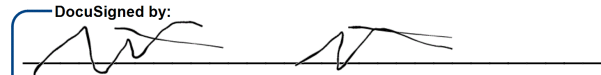
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27 ¹ Sian Griffiths, *Pupils pose little risk of spreading COVID*, The Sunday Times (Aug. 9,
28 2020), available at <https://www.thetimes.co.uk/article/pupils-pose-no-risk-of-spreading-covid-27q6zfd9l>.

1 symptoms. They found no evidence of either child to adult spread, or even of child to
2 child spread. They concluded that “[w]hile children become infected by SARS- CoV-
3 2, they do not appear to transmit infection to others. Furthermore, children more
4 frequently have an asymptomatic or mild course compared to adults.”²

5 6. Contrary to the anecdotes and newspaper articles cited by the Defendants,
6 the overwhelming bulk of scientific studies that have examined the topic – including the
7 best studies, which take pains to distinguish correlation from causation – find that
8 children play a limited role in spreading COVID-19 infection to adults and that children
9 themselves face minimal risk of poor outcomes if they should become infected.

10
11 I declare under penalty of perjury, under the laws of the United States of America
12 and the State of California, that the foregoing is true and correct.

13
14 Dated: August 12, 2020

DocuSigned by:

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Jayanta Bhattacharya, M.D., Ph.D.

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26 ² Helena C. Maltezou Rengina Vorou Kalliopi Papadima, et al. (2020) “Transmission
27 dynamics of SARS- CoV- 2 within families with children in Greece: a study of 23
28 clusters” Journal of Medical Virology, <https://doi.org/10.1002/jmv.26394> (accessed
August 12, 2020).