

DECLARATION OF AUBRE DUNKLEBERGER

I, AUBRE DUNKLEBERGER, declare and state as follows:

1. I began working at MH569 around June 2016. I left the employment of Sodexo around October 2018.
2. I started as a utility and eventually became a cook 1.
3. I spent the entirety of my employment with Sodexo at MH 569.
4. MH 569 was always very busy, having to provide thousands of meals to Marines every day.
5. I worked on Saturdays at MH 569. Saturdays were hamburger days, and on Saturdays the cooks were pushed to the limit.
6. I was responsible for preparing burgers at least once a month over the course of my employment.
7. Cooks had to prepare so many hamburgers that, on the days that I prepared burgers, I was rushed and forced to take shortcuts in order to meet the production demands.
8. I frequently operated the grills at MH 569, not just on Saturdays. My shifts started at 2 AM, and I used the grills frequently to prepare breakfasts, including items like French toast and pancakes.
9. There were four grills in MH 569, one for each line. The grills had large flat tops with 4-6 dials to control the temperature. The grills were old, and some didn't work properly.
10. There would often only be three grills used to cook hamburgers on Saturdays. I believe this was because one of the grills only had half of its cook surface heat up properly.
11. On Saturdays, hamburger cooking would usually begin after breakfast ended, around 7 AM. If the grills were not being used for breakfast, hamburger preparation would begin earlier.
12. I began the burger cooking process by heating up the grill. They take some time to heat up, so I would turn it on to the highest setting and let it heat up while I prepared other things or while getting the hamburger patties.
13. The frozen hamburger patties came in boxes. The boxes would be stored in a freezer and then taken to the walk-in cooler, where they sat until the cooks picked them up. As a result, sometimes the patties would be partially thawed by the time I began cooking them. I would put about four boxes of patties on a cart and take it to a grill.

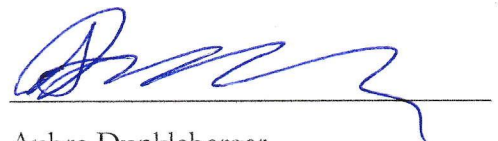
14. I cooked the burgers by taking a stack of hamburger patties from the box and putting them on the grill in rows of three, approximately 12 patties across, or 36 total, on the grill surface. While the patties cooked, I would remove the paper separating other patties in the box.
15. I would wait to flip the burgers until most of the blood had come off the top, and the top began to grey. I would flip the burgers in the order in which I placed them on the grill. I would let the patties cook a while longer until there was no more blood seen. I would add cheese to the patties immediately before removing them from the grill top, after which I would put the patties on the buns.
16. I did not have a specific amount of time that I cooked the patties. I do not ever recall being informed that there was a minimum amount of time to cook the patties.
17. Due to the production demands on cooks cooking burgers on Saturdays, my goal was to just get the hamburgers done.
18. Sometimes, I would cut into a patty to see if it was cooked the whole way through before removing it from the grill.
19. The thermometer did not work well when the patties were on the grill; the patties were so thin that the thermometer would be affected by the grill surface. It was also not possible to get an accurate temperature when patties were removed from the grill, because they cooled down too fast.
20. I recall learning to take temperatures at a meeting with Dave Bowser, although I do not recall when this meeting took place. He and a few managers brought all the cooks together and told us how to fill out temperature logs and how to take temperatures. Mr. Bowser instructed us to take the temperature of burgers by inserting the thermometer tip into the center of the patty at an angle.
21. The HACCP logs for recording temperatures were set up so that we could record a temperature for every batch as well as the time, but most of the time I would just write temperatures on a blank piece of paper. I would try to record the temperature, the time it was taken, and roughly how many patties were in the batch.
22. I did not take more than one burger temperature per batch.
23. It was difficult to record the time and temperature for every batch because we were under a lot of pressure to get burgers done as fast as we could, so we'd be more focused on getting food cooked and out to the lines. Every once in a while, we would get behind on burgers

and forget or be unable to write down times and temperatures. There were situations where cooks would write temperatures down at the end of their shifts.

24. We would take whatever we recorded temperatures on and either put it on the chief cook's desk or give it to our manager. If I had to stay throughout lunch, I would put my temperature notes on the chief cook's desk. However, because I know someone who turned in their temperature notes and got in trouble because they were subsequently lost, I would usually give my papers directly to the manager on duty to make sure he got it.
25. I recall using ovens to cook the hamburgers at least once. The raw patties would be put on pans—with the patties overlapping slightly to accommodate more in the pan—and placed directly into the ovens; they were not grilled beforehand. I do not recall what the oven temperatures were set at or for how long the burgers were cooked in the ovens.
26. A lot of other recipes required the use of ovens, so burgers would only be cooked in ovens that were available. I do not recall how many burgers could be cooked in an oven, but I know that an entire lunch period's worth of burgers could not be cooked in a single batch.
27. I do not recall ever being informed of the outbreak by any Sodexo "higher-ups." I learned of the outbreak from my coworkers.
28. I recall our supervisors being much stricter about meat preparation shortly after the outbreak. After the outbreak, managers came to the mess hall more often and inspections by non-Sodexo persons increased.

I declare under penalty of perjury under the laws of the State of Oklahoma and the laws of the United States of America that the foregoing is true and correct.

DATED at Duncan, Oklahoma on this 21 day of April, 2020.



Aubre Dunkleberger