

Cause No. DC-20-06131

CITY OF DALLAS,
Plaintiff,

v.

S&B HOT MESS ENTERPRISES, LLC *d/b/a*
SALON A LA MODE, AND
SHELLEY LUTHER, *individually*,
Defendants.

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IN THE DISTRICT COURT

DALLAS COUNTY, TEXAS

14th JUDICIAL DISTRICT

AFFIDAVIT

STATE OF TEXAS
COUNTY OF DALLAS

BEFORE ME, the undersigned authority, personally appeared Philip Huang, MD, MPH who upon being duly sworn, deposed and stated as follows:

“My name is Philip Huang, MD, MPH, I am over the age of eighteen (18) and am otherwise competent to make this affidavit.

I am a physician licensed to practice medicine in the State of Texas and the Director of Dallas County Health and Human Services. I have been the Director of Dallas County Health and Human Services Department since February 2019. Prior to serving as Director in Dallas County, I served for 11 years as the Medical Director and Health Authority for the Austin Public Health department.

I received my undergraduate degree in Civil Engineering from Rice University, my MD from the University of Texas Southwestern Medical School, and my Master's in Public Health from Harvard with a concentration in Health Policy and Management.

I completed my residency training in Family Medicine at Brackenridge Hospital in Austin, and served two years as an Epidemic Intelligence Service (EIS) officer with the Centers for Disease Control and Prevention assigned to the Illinois Department of Public Health where I conducted epidemiologic studies in chronic disease and infectious disease outbreak investigations.

Additionally, I am currently an Assistant Professor with the University of Texas at Austin, Dell Medical School, and an Adjunct Assistant Professor with the University of Texas School of Public Health, Austin Campus.

I have served as Principal Investigator for numerous CDC and State-funded public health cooperative agreements.


I am familiar with the diagnosis and treatment of respiratory viruses similar to COVID-19. I am also familiar with the transmission and spread of similar viruses and the recommended measures to mitigate their spread and transmission.

Additionally, I am familiar with the emergency medical resources available in the City of Dallas and familiar with the impact the unmitigated spread of an infectious disease can have on the public health of the City of Dallas. I am qualified to render an expert opinion on the impact of COVID-19 on the emergency medical resources and public health in the City of Dallas.

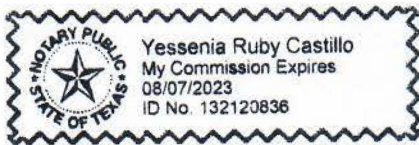
COVID-19 is a global pandemic that has spread rapidly throughout much of the world. There are now at least 3,105 confirmed cases and 84 deaths in Dallas County. The unmitigated spread of the disease threatens to overwhelm the emergency medical and health care resources in the City of Dallas. Due to the risk of spread to the community, it is essential that the spread of the virus be slowed to protect the ability of public and private health care providers to handle the influx of new patients and continue to respond to other health and safety needs of the community.

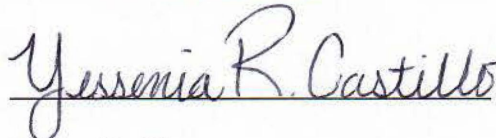
Respiratory viruses like COVID-19 are typically spread between people who are in close contact with one another and via respiratory droplets produced when an infected person coughs or sneezes. Because of the risk of the rapid spread of the virus, and the need to protect the most vulnerable members of the community, the State of Texas, Dallas County, and the City of Dallas issued emergency orders to mitigate the spread of COVID-19. The orders require all individuals anywhere in the City of Dallas and Dallas County to shelter in place – that is, stay at home – except for while engaging in certain essential activities. In addition, the orders require non-essential businesses to remain closed, with only certain very specific exceptions. The current orders protect the public health and mitigate the spread of the disease by reducing the opportunities for the virus to spread. to large groups.

Any failure to comply with the orders issued by the State of Texas, Dallas County, and the City of Dallas poses a significant health and safety concern for the City due to the ongoing global pandemic resulting from the COVID-19 respiratory virus.”


Philip Huang, MD, MPH

Subscribed and sworn to before me this 28th day of April 2020.




Notary Public