

EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA

_____)	
BENJAMIN COKER, <i>et al.</i>)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 3:21-cv-01211-AW-HTC
)	
LLOYD AUSTIN, III, in his official)	
capacity as Secretary of Defense, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

DECLARATION OF COLONEL TONYA RANS

I, Colonel Tonya Rans, hereby state and declare as follows:

1. I am currently employed by the U.S. Air Force as the Chief, Immunization Healthcare Division, Defense Health Agency – Public Health Directorate, located in Falls Church, Virginia. I have held the position since June 2017. I am a medical doctor and have been board certified in Allergy/Immunology since 2008 and was a board-certified Pediatrician from 2001-2015.

2. In my current role, my responsibilities include directing a responsive, evidence-based, patient-centered organization promoting optimal immunization healthcare for all Department of Defense (“DoD”) beneficiaries and those authorized to receive immunization from DoD. This includes assisting in policy development, providing implementation guidance and education, and engaging in clinical studies and research through clinical collaboration. The Defense Health Agency-Immunization Healthcare Division (“DHA-IHD”) routinely engages with the medical representatives from the military departments, U.S. Coast Guard, Joint Staff, Combatant Commands, and others to develop standardized immunization implementation

guidance in accordance with published policy for consistency across DoD where possible.

3. I have previously filed declarations in this matter and am aware of the allegations set forth in the pleadings. This declaration is based on my personal knowledge, and/or information made available to me during the routine execution of my official duties.

4. As part of my duties, I am able to obtain information regarding the number and locations of DoD's on-hand COVID-19 vaccine doses within logistics departments. Exhibit A is a spreadsheet that reflects the number of BLA-approved, Comirnaty-labeled and BLA-approved, Spikevax-labeled COVID-19 vaccine doses that DoD possesses on-hand and can make available for administration for service members, beneficiaries, and others eligible for COVID-19 vaccine from DoD as of 18 October 2022, sorted by manufacturer, lot number, and location. As of October 18, 2022, there are 49,410 BLA-approved, Comirnaty-labeled COVID-19 vaccine doses and 770 BLA-approved, Spikevax-labeled COVID-19 vaccine doses within DoD available for administration. There are no ordering restrictions for these products.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on October 18, 2022, in Falls Church, Virginia

RANS.TONYA.SUE.1
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Digitally signed by
RANS.TONYA.SUE.1081263031
Date: 2022.10.18 19:36:12 -04'00'

Tonya S. Rans
Colonel, Medical Corps, U.S. Air Force
Director, Immunization Healthcare Division
Public Health Directorate
Falls Church, Virginia

Exhibit A

Source: DHA Medical Logistics, 18 October

"Blank" in the sheet below refers to sites that have not updated the logistics system with the associated lot number.

PFIZER GREY CAP COMIRNATY	49,410
6505017016582	49,410
4302MF023	60
CVRP 01 02 AA COVID-19 VACCINE RESPONSE PROGRAM (NMRTC 29 PALMS)	60
FW1330	9,432
CVRP 01 01 AA COVID-19 Vaccine Response Program	54
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM LANGLEY AFB (633RD MDG) ACC	180
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM (BROOKE ARMY MEDICAL CENTER, TX)	810
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM (FORT LEE, KENNER AHC)	60
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM (MADIGAN ARMY MEDICAL CENTER, TACOMA WA	2,256
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM (WEST POINT, NY KELLER AHC)	120
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM 17TH MEDICAL GROUP	6
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM 28TH MED GROUP ELLSWORTH AFB	30
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM 375TH MDG SCOTT AFB	42
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM 6TH MEDICAL GROUP MACDILL AFB	120
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM 88TH MDG-WPAFB OH	240
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM 92ND MEDICAL GROUP FAIRCHILD	120
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM FM3047 WILFORD HALL ASC	2,700
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM MOUNTAIN HOME AFB	30
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM NAVEL HOSPITAL JACKSONVILLE	6
CVRP 01 02 AA COVID-19 VACCINE RESPONSE PROGRAM (BHEC BANGOR)	54
CVRP 01 03 AA COVID-19 VACCINE RESPONSE PROGRAM (NMRTC SAN DIEGO)	1,500
CVRP 01 08 AA COVID-19 VACCINE RESPONSE PROGRAM (MCRD)	804
CVRP 11 02 1 COVID-19 VACCINE RESPONSE PROGRAM MISAWA AFB	300
FW1331	15,420
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGR (KADENA AB, 18TH MDG, PACAF)	294
CVRP 01 01 AA COVID-19 Vaccine Response Program	378
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM (CARL R DARNELL AMRY MEDICAL CENTER)	234
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM (FORT BENNING GA)	450
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM (FORT BRAGG NC)	240
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM (FORT RUCKER AL, LYSTER AHC)	108
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM (FT CAMPBELL BLANCHFIELD)	132
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM (FT DRUM NY GUTHRIE AHC)	156
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM (FT EUSTIS MCDONALD ARMY HEALTH CTR MAHC)	36
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM (FT HUACHUCA, AZ RWBLISS AHC)	54
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM (96TH MEDICAL GROUP)	660
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM (USA MEDDAC FT RILEY KS, IRWIN ACH)	180
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM 19TH MED/GP LITTLE ROCK AR	30
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM 59TH MEDICAL GRP LUKE AFB	6
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM 82ND MDG SHEPPARD AFB	360
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM FM3047 WILFORD HALL ASC	240
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM GUANTANAMO BAY CUBA	300
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM KESSLER MEDICAL CENTER	60
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM NAVAL HEALTH CLINIC CHERRY POINT	360
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM NELLIS AFB	720
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM YOKOTA AB (374TH MDG) PACAF	342
CVRP 01 02 AA COVID-19 VACCINE RESPONSE PROGRAM (NMRTU PARRIS ISLAND)	6,900
CVRP 01 02 AA COVID-19 VACCINE RESPONSE PROGRAM NHC QUANTICO	60
CVRP 01 02 AA COVID-19 VACCINE RESPONSE PROGRAM VANDENBERG AFB (30TH MDG) AFSPC	288
CVRP 01 03 AA COVID-19 VACCINE RESPONSE PROGRAM (CAMP PENDLETON)	1,200
CVRP 01 03 AA COVID-19 VACCINE RESPONSE PROGRAM (NMRTC SAN DIEGO)	1,188
CVRP 01 04 AA COVID-19 VACCINE RESPONSE PROGRAM (CENTRAL IMMS BLDG 2)	150
CVRP 01 07 AA COVID-19 VACCINE RESPONSE PROGRAM (NAS NORTH ISLAND)	114
CVRP 01 09 AA COVID-19 VACCINE RESPONSE PROGRAM (NTC)	30
CVRP 01 10 AA COVID-19 VACCINE RESPONSE PROGRAM (MCAS MIRAMAR)	150
FW1333	3,972
CVRP 01 01 AA COVID-19 Vaccine Response Program	30

Source: DHA Medical Logistics, 18 October

“Blank” in the sheet below refers to sites that have not updated the logistics system with the associated lot number.

CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM (FORT KNOX KY, (IRAHC)	66
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM - JBER	360
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM (EVANS ARMY COMUNITY HOSPITAL)	60
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM (FORT SILL OK REYNOLDS AHC)	240
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM (FT CAMPBELL BLANCHFIELD)	300
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM (FT STEWART, GA WINN AHC)	54
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM (FT WAINWRIGHT, USAMEDDAC-ALASKA)	600
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM (TRIPLER ARMY MEDICAL CENTER, HI)	96
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM (NMRTC BEAUFORT)	48
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM 59TH MEDICAL GRP LUKE AFB	1,080
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM 82ND MDG SHEPPARD AFB	30
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM 92ND MEDICAL GROUP FAIRCHILD	60
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM NAVAL HEALTH CLINIC CHERRY POINT	180
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM NAVEL HOSPITAL JACKSONVILLE	180
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM NELLIS AFB	360
CVRP 01 02 AA COVID-19 VACCINE RESPONSE PROGRAM (YUMA, AZ)	48
CVRP 01 02 AA COVID-19 VACCINE RESPONSE PROGRAM NAVHOSP CAMP LEJEUNE	162
CVRP 01 04 AA COVID-19 VACCINE RESPONSE PROGRAM - PATUXENT RIVER	18
GH9697	60
CVRP 01 01 AA COVID-19 Vaccine Response Program	60
GH9702	3,228
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM KESSLER MEDICAL CENTER	228
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM NELLIS AFB	3,000
GJ6665	5,940
CVRP 01 01 AA COVID-19 Vaccine Response Program	540
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM NELLIS AFB	5,400
(blank)	11,298
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM (MONCRIEF AHC, FORT JACKSON SC)	480
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM (WALTER REED- BETHESDA)	10,818

SPIKEVAX	770
6505017030077	470
052C22A	470
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM (FT CAMPBELL BLANCHFIELD)	100
CVRP 01 01 AA COVID-19 VACCINE RESPONSE PROGRAM 377 MEDICAL GROUP KIRTLAND	90
CVRP 01 02 AA COVID-19 VACCINE RESPONSE PROGRAM (NMRTU PARRIS ISLAND)	280
6505017030084	300
(blank)	300
CVRP 11 02 1 COVID-19 VACCINE RESPONSE PROGRAM MISAWA AFB	300