

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
EVANSVILLE DIVISION**

NICOLE K. and ROMAN S., by next friend
Linda R.; ABIGAIL R., LILY R., and
RACHEL H., by next friend Nancy B.; and
ANNA C., BRIAN P., AMELIA P.,
ALEXA C., and ZACHARY H., by next
friend Jessie R.; for themselves and those
similarly situated,

Plaintiffs,

v.

MARION COUNTY, LAKE COUNTY,
and SCOTT COUNTY, INDIANA

Defendants.

Case No.:

JURY TRIAL DEMANDED

**DECLARATION OF KATHLEEN A. DELANEY IN SUPPORT OF PLAINTIFFS'
MOTION FOR CLASS CERTIFICATION AND APPOINTMENT OF CLASS COUNSEL**

I, Kathleen A. DeLaney, hereby declare:

1. I am counsel for Plaintiffs in this action, and I submit this declaration in support of Plaintiffs' Motion for Class Certification and Appointment of Class Counsel. I make this declaration based upon personal knowledge and, if called as a witness, could and would testify competently to the matters set forth herein.

2. I am the managing member of DeLaney & DeLaney LLC.

3. I currently reside in Marion County, Indiana. I have lived in Marion County for most of my life, and most recently since 1994.

4. I am in the private practice of law, having graduated *summa cum laude*, Order of the Coif, and Order of the Barristers, from the Indiana University Maurer School of Law - Bloomington in May 1995.

5. I was admitted to the Indiana Bar in October 1995. I was admitted to the Illinois Bar in July 2016. I am also admitted to practice before the Supreme Court of the United States, the United States Court of Appeals for the Seventh Circuit, the United States District Court for the Southern District of Indiana, and the United States District Court for the Northern District of Indiana.

6. After law school, I served as a law clerk for the Honorable David F. Hamilton, while he was a United States District Court Judge for the Southern District of Indiana. Judge Hamilton now serves on the Seventh Circuit Court of Appeals.

7. From September 1997, through December 2001, I was an associate attorney with the law firm Ice Miller LLP in Indianapolis. I practiced in the litigation section handling a variety of complex matters.

8. In the courtroom, my experience includes jury trials, bench trials, and appellate arguments.

9. Since 2014, I have been a member of the American Law Institute. For many years, I served by invitation as the Secretary of the Local Rules Advisory Committee for the United States District Court for Southern District of Indiana. For many years, I served by invitation on the Supreme Court of Indiana's Character and Fitness Committee of the State Board of Law Examiners. I previously completed terms as a Barrister in the Sagamore American Inn of Court. I am a member of the public arbitrator panel of the FINRA Dispute Resolution Board of Arbitrators.

10. In January 2002, my mother, Ann DeLaney, and I began our litigation practice in Indianapolis.

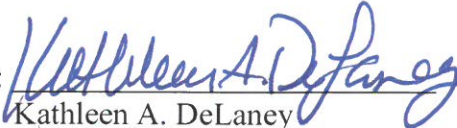
11. DeLaney & DeLaney LLC is a private law firm with extensive experience in complex civil litigation, including class action litigation, and which maintains an office in Indianapolis.

12. DeLaney & DeLaney LLC has investigated all claims in this action and has committed sufficient resources to represent the proposed class.

13. DeLaney & DeLaney LLC is aware of no conflicts between or among members of the proposed class.

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

Executed at Indianapolis, Indiana, this 5th day of February, 2019.

By: 
Kathleen A. DeLaney