

**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 STEPHEN D. KEANE IN SUPPORT OF PLAINTIFFS' MOTION
FOR CLASS CERTIFICATION AND APPOINTMENT OF CLASS COUNSEL**

I, Stephen D. Keane, 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 an attorney at the law firm of Morrison & Foerster LLP.
3. I am a member of the bar of the State of California and have also been admitted in several U.S. District Courts and the United States Courts of Appeals for the Federal Circuit and the Fourth Circuit. My colleague Mark C. Zebrowski, who is also serving as co-counsel in this action, is also a member of the bar of the State of California and has been admitted in several U.S. District Courts, the United States Court of Appeals for the Ninth Circuit, and the United States Supreme Court.

4. I maintain an active pro bono practice at Morrison & Foerster LLP. In that capacity, I have fought aggressively for children's rights and have filed impact litigation in this area in state and federal courts. I am part of the Morrison & Foerster pro bono team that won a precedent-setting summary judgment victory for foster children in California, an effort that earned the team the President's Pro Bono Service Award from the State Bar of California. I also spearheaded an effort to increase public disclosure of county welfare documents following fatal child abuse, obtaining a writ of mandamus against a California state agency. In addition to my pro bono practice, I have substantial litigation and trial experience in federal courts across the county.

5. My colleague Mark C. Zebrowski has more than 35 years of litigation experience representing clients across a variety of industries and is active in both state and federal court. Mr. Zebrowski is a member of the American Board of Trial Advocates ("ABOTA"); a founding Master in the Wallace Chapter of the American Inns of Court; a director of the Thomas Jefferson School of Law; a past president of the San Diego Chapter of the Association of Business Trial Lawyers; the former managing partner of the San Diego Morrison & Foerster office; and has served on numerous other non-profit boards.

6. Morrison & Foerster LLP is a global private law firm with extensive experience in complex civil litigation including class action litigation.

7. Morrison & Foerster LLP dedicates extraordinary resources to pro bono work, including class actions and actions to vindicate civil and constitutional rights of individuals. Morrison & Foerster LLP has represented a variety of plaintiffs in class action lawsuits, including migrant children detained in government custody, students with learning disabilities, and veterans organizations and individual service members, among others.

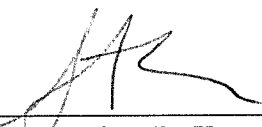
8. The attorneys of Morrison & Foerster LLP are committed to the vigorous, effective, and efficient prosecution of the interests of Plaintiffs and the proposed class.

9. Morrison & Foerster LLP has investigated all claims in this action and has committed sufficient resources to represent the proposed class.

10. Morrison & Foerster LLP 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 San Diego, California, this 5th day of February, 2019.

By: 
Stephen D. Keane