

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MOISES MORALES, et al.,)	
)	
Plaintiffs,)	
)	Case No.: 13-cv-07572
vs.)	
)	Hon. Amy J. St. Eve
)	
CRAIG FINDLEY, et al.,)	
)	
Defendants.)	

JOINT MOTION FOR CLASS CERTIFICATION

Pursuant to Rule 23 of the Federal Rules of Civil Procedure, the Parties jointly move the Court to issue an order certifying a plaintiff class of adult parolees in the State of Illinois. In support of this motion, the Parties state as follows:

1. The Parties jointly seek the certification of a settlement class of all people who, while on parole/Mandatory Supervised Release (“MSR”) are supervised by the Illinois Department Corrections (“IDOC”) and who now or in the future will be subject to parole revocation proceedings conducted by the IDOC and the Illinois Prisoner Review Board (“PRB”). The Settlement class does not include any persons encompassed by the class definition in *M.H. v. Monreal et al.*, (12-cv-8523).¹ The Settlement Agreement negotiated by the parties will provide due process protections for class members subject to parole revocation proceedings. Specifically, the Settlement Agreement requires that the Prisoner Review Board will screen parolees to determine if they meet certain eligibility criteria to be appointed counsel

¹ The *M.H.* Settlement class is defined as “juvenile parolees in the State of Illinois who currently face or in the future will face parole revocation proceedings.”

at no cost to them. If a parolee meets the eligibility criteria, the Prisoner Review Board will appoint counsel for that parolee. Under the Settlement Agreement, Defendants have also agreed to implement other procedural protections, including hearing timelines and guidelines to ensure that parole hearings are fair and unbiased and that parolees have sufficient notice of their alleged violation(s) and an opportunity to be heard.

2. The Supreme Court has sanctioned class certification for purposes of settlement. *See Amchem Products, Inc. v. Windsor*, 521 U.S. 591, 618 (1997). To certify a settlement class, the Court must still find that the proposed class meets the elements of Rule 23(a) and the requirements of either Rule 23(b)(1), (2), or (3). *See id.* at 613-14. Settlement should be used as “a factor in the calculus” of whether the class is certifiable. *Id.* at 622; *see also Smith v. Sprint Communications Co., L.P.*, 387 F.3d 612, 614 (7th Cir. 2004).

3. A class should be certified under FED. R. CIV. P. 23(a) when (1) the class is so numerous that joinder of all members is impracticable; (2) there are questions of law or fact common to the class; (3) the claims or defenses of the representative parties are typical of the claims or defenses of the class; and (4) the representative parties will fairly and adequately protect the interests of the class. *See also Siegel v. Shell Oil Co.*, 612 F.3d 932, 935 (7th Cir. 2010).

4. The proposed settlement class meets all of the requirements of Rule 23. The Parties can offer a good faith estimate that there are over 25,000 members in the settlement class, rendering joinder of all potential plaintiffs impracticable. *See Oplchenski v. Parfums Givenchy, Inc.*, 254 F.R.D. 489, 495 (N.D. Ill. 2008) (“Generally, where class members number at least 40, joinder is considered impracticable and numerosity is satisfied.”).

5. For purposes of commonality, a single “common contention” binds the putative class by virtue of the Defendants’ allegedly unlawful policies and practices. *WalMart v. Dukes*,

131 S.Ct. 2541, 2551 (2011); *see also N.B. v. Hamos*, -- F. Supp. 2d --, 2014 WL 562637, at *11 (N. D. Ill. Feb. 13, 2014) (A common contention may be found “where a ‘systemic failure’ or an ‘illegal policy’ is alleged; in such cases, the policy is the ‘glue’ that unites otherwise individualized claims.”) (internal quotation omitted). Plaintiffs allege that the Defendants lack any mechanism by which to appoint attorneys and fail to provide adequate procedural protections for parolees who are subject to revocation proceedings.

6. Similarly, the typicality requirement is met here because the claims of the named Plaintiffs and the putative class arise from the Defendants’ policies, practices, and procedures governing the parole revocation process, which apply equally to every member of the class. *See Rosario v. Livaditis*, 963 F.2d 1013, 1018 (7th Cir. 1992) (internal quotation omitted) (A claim is typical if it “arises from the same event or practice or course of conduct that gives rise to the claims of other class members.”)

6. In accordance with Rule 23(a)(4), the named Plaintiffs and their counsel will fairly and adequately represent the interests of the named Plaintiffs and the putative class members in this suit. “[A]dequacy of representation is composed of two parts: the adequacy of the named plaintiff’s counsel, and the adequacy of representation provided in protecting the different, separate, and distinct interest of the class members. Therefore, a class is not fairly and adequately represented if class members have antagonistic or conflicting claims.” *Retired Chicago Police Ass’n v. City of Chicago*, 7 F.3d 584, 598 (7th Cir. 1993) (internal quotations marks omitted). As to the first inquiry, Plaintiffs and the putative class are represented by attorneys with ample experience in class actions and civil rights litigation. *See* Declarations of Alexa Van Brunt (Roderick and Solange MacArthur Justice Center, Northwestern Law School), Sheila Bedi (Roderick and Solange MacArthur Justice Center, Northwestern Law School)

Vanessa del Valle (Roderick and Solange MacArthur Justice Center, Northwestern Law School) and Alan Mills (Uptown People's Law Center) (all attached as Exhibit A). Counsel have vigorously pursued this case on behalf of the class members, and will continue to do so as the settlement goes into effect.

7. Second, the proposed class representatives, individuals on parole who themselves face future risk of revocation, have demonstrated their commitment to protect not only their own rights but the rights of all absent class members. *See* Declaration of Named Plaintiffs (attached as Exhibit B). There are no conflicts of interest between the named Plaintiffs and the class members, as the case seeks solely injunctive relief and the claims of class members are identical.

8. In addition, the proposed class also meets the requirements of Rule 23(b)(2) and, alternatively, Rule 23(b)(3). For purposes of Rule 23(b)(2), Defendants' actions have been taken "on grounds generally applicable to the class, thereby making appropriate final injunctive or corresponding declaratory relief with respect to the class a whole." FED. R. CIV. P. 23(b)(2). "[C]ases in the civil-rights field" are "illustrative" of the class actions meant to be certified under Rule 23(b)(2). *Stewart v. Rubin*, 948 F.Supp. 1077, 1089 (D.C. Cir. 1997) (quoting Advisory Committee Notes to 1966 Amendments to Rule 23(b)(2)). *See also Johns v. DeLonardis*, 145 F.R.D. 480, 484 (N.D. Ill. 1992) ("We are also mindful that certification under 23(b)(2) is particularly appropriate in class actions brought to vindicate civil rights[.]"). Plaintiffs have brought civil rights claims based upon policies and procedures that apply to all adult parolees who face or might in the future face parole revocation proceedings, and certifying a class will ensure that the agreed-upon relief will be felt by all such parolees. *See Westefer v. Snyder*, Nos. 00-162GPM, 00-708-GPM, 2006 WL 2639972, at *9 (S.D. Ill. 2006) ("Providing a vehicle for

redressing civil rights violations on a class-wide basis through injunctive or declaratory relief is the fundamental purpose of Rule 23(b)(2).”).

9. In the alternative, the proposed class satisfies the requirements of FED. R. CIV. P. 23(b)(3), which mandates that “questions of law or fact common to the members of the class predominate over any questions affecting only individual members.” To qualify for certification, individual questions must “not overwhelm questions common to the class[.]” *Amgen Inc. v. Connecticut Retirement Plans and Trust Funds*, 133 S.Ct. 1184, 1196 (2013). As demonstrated by both the commonality and 23(b)(2) analysis, the questions of law and fact surrounding the Defendants’ parole revocation procedures for adult parolees predominate in this litigation. Whether the Defendants provide adequate protections to parolees during their revocation proceedings, including by appointing counsel, is a determination that is clearly susceptible to common proof. *See Streeter v. Sheriff of Cook County*, 256 F.R.D. 609, 614 (N.D. Ill. 2009) (“When a proposed class challenges a uniform policy, the validity of that policy tends to be the predominant issue in the litigation.”).

10. Each of the requirements of Rule 23 is satisfied here, and the Court should certify the proposed class for purposes of settlement.

WHEREFORE, the Parties request that the Court issue an order certifying for purposes of settlement a class of all people who, while on parole/MSR, are supervised by the IDOC and who now or in the future will be subject to parole revocation proceedings conducted by the IDOC and the PRB.

Respectfully submitted,

For the Plaintiff:

/s/ Sheila A. Bedi

Roderick and Solange MacArthur Justice Center
Northwestern University School of Law
375 East Chicago Avenue
Chicago, Illinois 60611
(312) 503-1336

For the Defendants:

/s/ Michael T. Dierkes

Michael T. Dierkes
Assistant Attorney General
General Law Bureau
100 W. Randolph, 13th Floor
Chicago, Illinois 60601
(312) 814-3720

Dated: October 24, 2016

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that she served the foregoing document via the Court's CM/ECF system on October 24, 2016.

/s/ Sheila A. Bedi

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CRAIG FINDLEY, et al.,)	
)	
Defendants.)	

DECLARATION OF ALEXA VAN BRUNT

I, Alexa Van Brunt, counsel for the Plaintiffs and putative class in the above captioned case, state that the following is true and correct to the best of my knowledge:

1. I am an attorney and clinical assistant professor at the Roderick and Solange MacArthur Justice Center at Northwestern School of Law in Chicago, Illinois. I submit this declaration in support of the Parties' joint motion for class certification.
2. Since graduating from Stanford Law School in 2009, my practice has focused on civil rights and criminal justice reform. After clerking for the Honorable Myron H. Thompson of the Middle District of Alabama, I joined the clinical faculty at the Roderick and Solange MacArthur Justice Center at Northwestern Law School. With MacArthur, I have been party to numerous actions aimed at vindicating the personal rights of individuals, as well as systematic reform in government institutions.
3. I have participated as lead counsel in two other class action suits challenging parole revocation procedures in the State of Illinois. *See King v. Walker*, No. 06cv204 (N.D. Ill.); *M.H. v. Monreal et al.*, No. 12cv8523 (N.D. Ill.). Both cases settled, resulting in significant procedural protections for parolees in Illinois. In *M.H.*, that settlement led to the state-wide

appointment of counsel for all youth facing the revocation of their parole. In addition, I have served as counsel in non-parole-related class action suits addressing such issues as: conflicts of interest within the Cook County State's Attorney's Office (*In re Petition for Appointment of Special Prosecutor*, No. 2011 Misc. 46 (Cir. Ct. Ck. Cty.)); the violation of prisoners' rights in Illinois correctional facilities (*Fontano v. Godinez et al.*, No. 12cv3042 (C.D. Ill.)); post-conviction relief for men who were convicted based on coerced and tortured confessions (*Class Action Petition for Relief Under the Illinois Post-Conviction Hearing Act*, Nos 91 CR 21451, 84 C 01010801 (Cir. Ct. Ck. Cty)); and the rights of pretrial detainees incarcerated in Cook County Jail based on their inability to afford cash bail bond (*Robinson v. Martin et al.*, 2016 CH 13587 (Cir. Ct. Ck. Cty.) (filed October 14, 2016)).

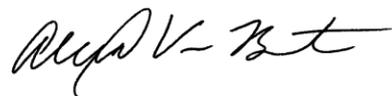
4. I have also litigated a variety of wrongful conviction compensation suits in federal court, including litigation brought on behalf of the victims of the Jon Burge police torture scandal and other police misconduct in Chicago, and throughout the State of Illinois. *See, e.g., Taylor v. City of Chicago et al.*, No. 14cv737 (N.D. Ill.) *Taylor v. Kachiroubas et al.*, No. 12cv8321 (N.D. Ill.); *Swift v. City of Chicago et al.*, 12-L-012995 (Cir. Ct. Ck. Cty 2012), *Wilson v. O' Brien et al.*, No. 07cv3994 (N.D. Ill.); *Kitchen v. Burge*, No. 10cv4093 (N.D. Ill.); *Beaman v. Souk*, No. 10cv1019 (C.D. Ill.); and *Cannon v. Burge et al.*, No. 05cv2192 (N.D. Ill.).

5. I am a member in good standing of the bar of the State of Illinois.

6. The Roderick and Solange MacArthur Justice Center has sufficient funds to finance the costs of this litigation.

I declare under penalty of perjury that the foregoing is true and correct.

Date: October 24, 2016

A handwritten signature in black ink, appearing to read "Alexa V. Brunt". The signature is fluid and cursive, with the first name "Alexa" and last name "Brunt" clearly distinguishable.

Alexa Van Brunt, ARDC No. 6301074
Roderick and Solange MacArthur Justice Center
375 E. Chicago Avenue
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(312) 503-1336

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)	
CRAIG FINDLEY, et al.,)	
)	
Defendants.)	

DECLARATION OF SHEILA A. BEDI

I, Sheila A. Bedi, counsel for the Plaintiffs in the above captioned case, state that the following is true and correct to the best of my knowledge:

1. I am a Clinical Associate Professor of Law at the Northwestern University Law School and an attorney with the Roderick and Solange MacArthur Justice Center. I submit this declaration in support of the Plaintiffs' motion for class certification.

2. For almost fifteen years, my practice has focused almost exclusively on enforcing the rights of adults and children who are imprisoned through federal civil rights litigation. During my first two years of practice, I developed a prisoners' rights litigation project at the Georgetown University Law Center. My work in that project included constitutional litigation on behalf an inmate with HIV/AIDS. *Smith v. Carpenter*, 316 F.3d 178 (2d Cir. 2003). I also monitored conditions at the District of Columbia Jail to ensure the District's compliance with the final order in *Inmates of D.C. Jail v. Jackson*, No. 75-1668 (D.D.C.).

3. My experience in federal district court includes actions under the Freedom of Information Act, *Morrison v. DOJ*, No. 02:01552 (D.D.C.); *Puerto Rican-Am. Research Inst. v. U.S. Dep't of the Army*, No. 02:02082 (D.D.C.); *Kothari v. DOT.*, No. 03:00223, (D.D.C.); and

under Title VII of the Civil Rights Act of 1964, *Johnson-Harrison v. Beverly Health*, No. 01:01677 (D.D.C). In addition to my work in district court, I have made several appearances in various courts of appeals. I represented amicus curiae, the Project on Government Oversight, in an employment discrimination matter in the Tenth Circuit. *Bastien v Campbell*, No. 02:1342 (10th Cir.). I have also briefed and argued civil rights actions in the Ninth and Eleventh Circuits. *Love v. Delta Air Lines*, 310 F.3d 1347 (11th Cir. 2002) (disability rights claim under the Air Carrier Access Act); *Antonio-Martinez v. INS*, 317 F.3d 1089 (9th Cir. 2003) (appeal of asylum denial).

4. I have participated as counsel in numerous class action lawsuits involving the constitutional rights of incarcerated or institutionalized persons including: *Troupe v. Barbour*, No. 3:10-cv-153 HTW-LRA (S.D. Miss) (class action on behalf of children with mental health needs who were unlawfully institutionalized or otherwise denied Medicaid services); *E.W. v. Lauderdale County*, No. 4:09-cv-137 TSL-LRA (class action on behalf of children detained in the Lauderdale County Juvenile Detention Center); *D.W. v. Harrison County*, No. 1:09-cv-267 LG-RHN (S.D. Miss.) (class action on behalf of children detained in the Harrison County Juvenile Detention Center); *J.A. v. Barbour*, No. 3:07-cv-00394, (S.D. Miss) (class action on behalf of children incarcerated at the Columbia Training School); *K.L.W. v. James*, No. 04-CV-149, (S.D. Miss.) (class action on behalf of children incarcerated at the Columbia Training School); *Morgan v. Sproat*, 432 F. Supp. 1130 (S.D. Miss. 1977) (monitoring State of Mississippi's compliance with judgment in conditions case on behalf of a class of incarcerated youth at Oakley Training School); *Baker v. Campbell*, No. CV-03-1114-M (N.D. Ala.) (class action on behalf of chronically ill prisoners at Alabama correctional facility); and *King v. Walker*, No. 06cv204 (N.D. Ill) and *M.H. v. Monreal et al.*, No. 12cv8523 (N.D. Ill.) (class

actions on behalf of parolees). I have particular expertise representing youth involved with the justice system and have represented students with disabilities in *P.B. v. Pastorek*, No. 2:10-cv-04049 (E.D. La.), a class action filed in U.S. District Court in New Orleans under the IDEA, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act.

6. I am a member in good standing of the bars of the state of Mississippi, Illinois and Washington D.C.

7. The MacArthur Justice Center has sufficient funds available to finance the costs of this litigation and the ongoing monitoring required to protect the interests of the class.

I declare under penalty of perjury that the foregoing is true and correct.



Date: October 24, 2016

Sheila A. Bedi, ARDC # 6314970
Northwestern University School of Law
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Plaintiffs,)	
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)	
CRAIG FINDLEY, et al.,)	
)	
Defendants.)	

DECLARATION OF VANESSA DEL VALLE

I, Vanessa del Valle, counsel for the Plaintiffs and putative class in the above captioned case, state that the following is true and correct to the best of my knowledge:

1. I am an attorney and clinical assistant professor at the Roderick and Solange MacArthur Justice Center at Northwestern School of Law in Chicago, Illinois. I submit this declaration in support of the Parties' joint motion for class certification.
2. Since graduating from Stanford Law School in 2013, my practice has focused on civil rights and criminal justice reform. After clerking for the Honorable Ruben Castillo of the Northern District of Illinois, I joined the clinical faculty at the Roderick and Solange MacArthur Justice Center at Northwestern Law School in late 2015. With MacArthur, I have been party to numerous actions aimed at vindicating the personal rights of individuals, as well as systematic reform in government institutions.
3. I have participated as counsel in one other class action suit challenging parole revocation procedures in the State of Illinois. *See M.H. v. Monreal et al.*, No. 12cv8523 (N.D. Ill.). I joined *M.H.* after the case had settled. The *M.H.* settlement led to the state-wide appointment of counsel for all youth facing the revocation of their parole. In addition, I have

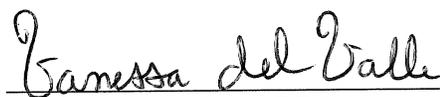
served as counsel in other suits addressing such issues as: conflicts of interest within the Cook County State's Attorney's Office (*In re Appointment of Special Prosecutor*, No. 16 MR 00005 (Cir. Ct. Ck. Cty.)); the violation of prisoners' rights in Illinois correctional facilities (*Fontano v. Godinez et al.*, No. 12cv3042 (C.D. Ill.); *Vonperbandt v. Baldwin et al.*, No. 16cv2675 (N.D. Ill.)); the wrongful death of detainees in the St. Clair County Jail (*Corbier v. Watson et al.*, No.16cv257 (S.D. Ill.); *White v. Watson et al.*, No. 16cv560 (S.D. Ill.)); police misconduct (*Outlaw. City of Cahokia, et al.*, No. 16cv456 (S.D. Ill.)); and wrongful conviction compensation suits (*Swift v. City of Chicago et al.*, 12-L-012995 (Cir. Ct. Ck. Cty 2012); *Strong v. Tessmann et al.*, No. 16cv4885 (N.D. Ill.)).

4. I am a member in good standing of the bars of the state of Illinois and New York.

5. The Roderick and Solange MacArthur Justice Center has sufficient funds to finance the costs of this litigation and the ongoing monitoring required to protect the interests of the class.

I declare under penalty of perjury that the foregoing is true and correct.

Date: October 24, 2016



Vanessa del Valle, ARDC No. 6316634
Roderick and Solange MacArthur Justice Center
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(312) 503-5932

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CRAIG FINDLEY, et al.,)	
)	
Defendants.)	

DECLARATION OF ALAN MILLS

I, Alan Mills, counsel for the Plaintiff and putative class in the above captioned case, state that the following is true and correct to the best of my knowledge:

1. I am the Legal Director of the Uptown People's Law Center in Chicago, Illinois. I submit this declaration in support of the Parties' joint motion for class certification.
2. I have litigated dozens of civil rights actions brought by prisoners in both federal and state courts, including both individual cases and class actions.
3. I was appointed lead class counsel for the plaintiff class in *Westefer v. Snyder*, a case alleging that prisoners transferred to Tamms Correctional Center were not provided with a hearing which complied with the minimum requirements of due process. The order certifying the class and appointing me counsel is reported at 2006 U.S. Dist. LEXIS 64976 (S.D. Ill. September 12, 2006). The findings of fact and conclusions of law entered in plaintiffs' favor are reported at 2010 U.S. Dist. LEXIS 72758. (S.D. Ill., July 20, 2010).
4. I have also participated as counsel in two class action suits (in addition to this case) challenging parole revocation procedures in the State of Illinois. *See King v. Walker*, No. 06cv204 (N.D. Ill) and *M.H. v. Monreal et al.*, No. 12cv8523 (N.D. Ill.).

5. I am one of the counsel appointed to represent the plaintiff class in the following cases, both of which remain pending:

- a. *Rasho v. Walker*, 07-CV-1298, pending in the United States District Court for the Central District of Illinois, the Honorable Judge Mihm presiding (alleging mental health care provided to prisoners statewide by the Illinois Department of Corrections violates the Eighth Amendment) (class certification for settlement purposes entered May 6, 2011);
- b. *Holmes v. Godinez*, 11-cv-02961, currently pending in the United States District Court for the Northern District of Illinois, the Honorable Judge Aspen presiding (alleging the Illinois Department of Corrections is failing to accommodate the needs of deaf and hard of hearing prisoners in violation of the ADA and the Eighth Amendment)(class certified October 9, 2015); and
- c. *Boyd v. Godinez*, 12-cv-704, currently pending in the United States District Court for the Southern District of Illinois, the Honorable Judge Gilbert presiding (alleging conditions at Vienna Correctional Center violate the Eighth Amendment) (class certification for settlement purposes entered September 16, 2013).

6. In addition, I am one of the lead attorneys in three pending putative class action cases in which class certification has yet to be granted:

- a. *Lippert v. Gosh*, 10-cv-04603, currently pending in the United States District Court for the Northern District of Illinois, the Honorable Judge Ellis presiding (alleging that medical care provided statewide by the Illinois Department of Corrections violates the Eighth Amendment); and

- b. *Ross v Gossett*, 15-cv-309, currently pending in the United States District Court for the Southern District of Illinois, the Honorable Judge Yandle presiding (alleging excessive use of force by the tactical team at five southern Illinois prisons); and
- c. *Davis v. Baldwin*, 16-cv-600, currently pending in the United States District Court for the Southern District of Illinois, the Honorable Magistrate Judge Williams presiding by consent (alleging that Illinois' excessive use of segregation violates the Eighth Amendment).

7. The individual prisoner civil rights cases I have litigated which resulted in reported appellate decisions include: *Nelson v. Miller*, 570 F.3d 868 (7th Cir. 2009) (RLUIPA claim regarding denial of religious diet to prisoner at Tamms); *Pearson v. Welborn*, 471 F.3d 732 (7th Cir. 2006) (retaliation claim brought by prisoner at Tamms); *Dole v. Chandler*, 438 F.3d 804 (7th Cir. 2006) (reversal of summary judgment entered against prisoner plaintiff for failure to exhaust, in a case arising out of Menard); *Harper v. Albert*, 400 F.3d 1052 (7th Cir. 2005) (affirming judgment against plaintiff in an excessive use of force case arising from Menard); *Filmore v. Page*, 358 F.3d 496 (7th Cir. 2004) (reversing, in part, judgment against prisoner in an excessive use of force case arising from Menard); *Thomas v. Ramos*, 130 F.3d 754 (7th Cir. 1997) (affirming summary judgment in a due process case).

8. I am a member in good standing of the bars of the State of Illinois, the United States District Courts for the Northern, Central and Southern Districts of Illinois and the Seventh and Third Circuit Courts of Appeal.

I declare under penalty of perjury that the foregoing is true and correct.

Date: October 24, 2016



Alan Mills, ARDC No. 6181054
Uptown People's Law Center
4413 N. Sheridan Road
Chicago, IL 60640
(773) 769-1410

I, Montreal Thomas have been on parole for two years. During that time I have been working and have followed all of the parole rules. I was recently served with a parole violation report. This happened after an agent came to my host site and found marijuana in the closet. My host site was my cousin's house and the drugs were not mine.

At my preliminary parole hearing, I tried to explain to the hearing officer that the drugs did not belong to me and that I did not know they were in the house. I also tried to tell her that I had been working and complying with my parole rules. She wouldn't listen. It was like she had her mind made up. She found probable cause.

Now, I am locked up waiting for

my final revocation hearing. I can't prepare a defense because I can't use a phone. I need an attorney to help me get through this process so I can get home and get back to work. I have two children and I was supporting them. An attorney would be able to explain why I should ~~be~~ not be revoked - because I have been doing well in parole and have many responsibilities and because I did not commit the violation I was accused of.

I want to be a named plaintiff in this litigation because I want to make this process more fair for all parolees. I will make decisions as a named plaintiff in the best interests of all people who go through this unfair process.

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I attest that the above is true to the best of my knowledge and that I gave this statement freely and voluntarily.

By: Montreal D Thomas

Name: Montreal D. Thomas

DOC #: K81055

Address: _____

DECLARATION OF COOK COUNTY DETAINEE

I, Moises Morales, # 2013-0922153, a Cook County Detainee, who currently resides in Division 2, declare the following is true to the best of my knowledge:

I was released from Stateville on October, 6 2012. I got out of prison determined to change my life around. When I was released, I began one year of parole. While I was on parole, I worked on becoming independent. I was certified in advancing youth development after obtaining my GED. I began working the week I was released and was employed the entire time that I was on parole. I had to have a lot of determination and patience to stay on the right path.

I got picked up on September, 22nd 2013 accused of domestic battery. I was brought to the Cook County Jail. On Wednesday September 25th, I went to the parole board and someone served me with my parole violation paperwork. It was my first time being accused of violating my parole, and I did not understand the process. Any questions I asked were immediately answered with either "I don't know"

or "I am not the parole board." They showed a lack of interest in my questions.

The woman who served me my paperwork told me I could either waive my rights, postpone my hearing, or see the board on October 2nd.

The woman told me if I waived my right to a preliminary hearing, I would see the board faster. ^{MM} I decided to postpone my hearing until October ~~MM~~ 9th. I didn't understand the consequences of my decision compared to the other options I had.

I am now locked up and I have no idea how soon I will be home. I don't have anyone who can advise me about what to do who actually knows what they are talking about. All of this confusion could have been avoided if I had someone who could explain this process to me.

~~_____~~
~~_____~~
~~_____~~
~~_____~~
~~_____~~
~~_____~~

I attest that the above is true to the best of my knowledge and that I gave this statement freely and voluntarily.

By: Moises Morales

Name: Moises Morales

Address: 5206 S. Lockwood

Outside contact name: Gisselle Melo

Phone: 773-818-2065

[Faint, illegible text]

At my final revocation hearing, the PRB member told me it was in my best interests if he violated me because it would cut my time on parole and would allow me to leave WRC w/ no parole. I did not want to be violated but the man insisted that it would be best if I agreed to the violation. I finally said ok, I guess so & he violated me. The PRB man said I would be released from WRC w/ in a week. But the day before I was ^{to} be released I received paperwork telling me I had another 18 months to serve, because I was violated.

I was not allowed to present evidence at my final revocation hearing or speak on my own behalf. I believe I need an attorney to help me through this process because the process is impossible.

to figure out.

I want to be a named plaintiff
in this lawsuit because I want
to protect other people from
buy through the hell I'm
buy through. I am in a nightmare
because I didn't have an
attorney during the purchase process
I will represent the class during
and make decisions in the
best interests of all parties to
help others from buy through
this hell nightmare.

I attest that the above is true to the best of my knowledge and that I gave this statement freely and voluntarily.

By: Joaquin Rocha
Name: JOAQUIN ROCHA
DOC #: R26124
Address: _____