

Exhibit “D”

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

FLORENCE WALLACE, ET AL. : **CONSOLIDATED TO:**
 :
 Plaintiffs, : **CIVIL ACTION NO. 3:09-cv-0286**
 :
 v. :
 : (JUDGE CAPUTO)
 ROBERT J. POWELL, ET AL. :
 :
 Defendants. :

.....

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

WILLIAM CONWAY, ET AL. :
 :
 Plaintiffs, : CIVIL ACTION NO. 3:09-cv-0291
 :
 v. :
 : (JUDGE CAPUTO)
 MICHAEL T. CONAHAN, ET AL. :
 :
 Defendants. :

.....

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

H.T., ET AL. :
 :
 Plaintiffs, : CIVIL ACTION NO. 3:09-cv-0357
 :
 v. :
 : (JUDGE CAPUTO)
 MARK A. CIAVARELLA, ET AL. :
 :
 Defendants. :

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

SAMANTHA HUMANIK,	:	
	:	
Plaintiffs,	:	CIVIL ACTION NO. 3:09-cv-0630
	:	
v.	:	
	:	(JUDGE CAPUTO)
MARK A. CIAVARELLA, JR.,	:	
ET AL.	:	
	:	
Defendants.	:	

.....

**DECLARATION OF LAUREN C. FANTINI
IN SUPPORT OF PLAINTIFFS’ UNOPPOSED MOTION FOR
FINAL APPROVAL OF SETTLEMENT AND CLASS CERTIFICATION**

I, Lauren C. Fantini, state as follows:

1. I am an attorney at the law firm of Caroselli Beachler McTiernan & Conboy LLC (“Caroselli Beachler”), counsel for Plaintiffs in *H.T. v. Ciavarella*, No. 09-0286 (M.D. Pa.). I am a member of the Claims Committee in connection with Plaintiffs’ settlement with PA Child Care, LLC; Western PA Child Care, LLC; and Mid-Atlantic Youth Services Corp. (the “Settlement”), which is the subject of Plaintiffs’ Unopposed Motion for Final Approval of Settlement and Class Certification.

2. I make this declaration in support of Plaintiffs’ Unopposed Motion for Final Approval of Settlement and Class Certification.

3. Staff of Caroselli Beachler, working under my direction, arranged for the publication of a short form of the Legal Notice of a Class Action Settlement (the “Published Notice”), which was approved by the Court in its November 27, 2014 Order, to be published in two northeastern Pennsylvania newspapers: *The Times Leader* and *The Citizens’ Voice*.

4. The Published Notice appeared in each newspaper once; on December 11, 2013 in *The Times Leader* and on December 11, 2013 in *The Citizens Voice*. See *The Times Leader* proof of publication and *The Citizens’ Voice* proof of publication, true and correct copies which are attached, respectively, as Exhibits A and B.

5. I and others at Caroselli Beachler working under my direction returned telephone calls made by claimants to the toll-free call center described in the Declaration of Joseph Fantini.

6. I and others at Caroselli Beachler working under my direction also received calls directly from persons seeking information about the Settlement.

7. During these telephone calls, we assisted callers in understanding the Settlement and the Proof of Claim Form.

8. We also assisted callers in completing the forms necessary for the Claims Committee to obtain relevant documentation in support of claimants' claims.

9. As a result of these telephone calls, we mailed Proof of Claim Forms to claimants who had not received a Proof of Claim Form as a result of the December 10, 2013 mailings described in the Declaration of Joseph Fantini.

10. When I and others at Caroselli Beachler working under my direction spoke with claimants, we informed them that they were free to continue to follow-up with us for answers to questions at any time in the future when they may require it.

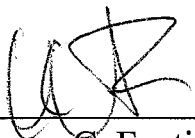
11. I anticipate that after final approval of the Settlement, I am likely to continue to receive calls regarding the Allocation Plan.

12. I and others at Caroselli Beachler working under my direction have entered data and uploaded documents relating to claimants' claims to the Microsoft Access database maintained by Anapol Schwartz and described in the Declaration of Joseph Fantini.

13. Caroselli Beachler has received no correspondence from Class Members that could be construed as objections to the Settlement.

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

Executed on May 30, 2014.



Lauren C. Fantini

Exhibit “A”

Proof of Publication

THE TIMES LEADER

(Under Act of No. 587, approved May 16, 1929)

STATE OF PENNSYLVANIA,
COUNTY OF LUZERNE

SS:

Kerry McCawell, being duly sworn according to law, deposes and says that he/she is the bookkeeper of The Times Leader, a daily newspaper published in the City of Wilkes-Barre, County and State aforesaid, by the Wilkes-Barre Publishing Company, Inc., that said The Times Leader was established in 1939, and that the printed notice or publication hereto attached is exactly as printed in the regular edition of The Times Leader on the following date(s):

Half Page ad, Times Leader, Wilkes-Barre, PA
12/12/2013

Affiant further deposes and says that The Time Leader is a daily newspaper of general circulation and that neither the affiant nor The Times Leader is interested in the subject matter of the aforesaid notice of advertisement, and that all allegations in the foregoing statement as to time, place and character of publication are true.

Copy of Notice
or Publication

Kerry McCawell
Sworn to before me this 28th day
of April, 2014.

Rosalie Kerpovich

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Rosalie Kerpovich, Notary Public
City of Wilkes-Barre, Luzerne County
My Commission Expires Dec. 16, 2017

Hall

From page 1B

1996 and from 1998-00 — beating Cox's Braves twice. After making only one trip to the playoffs in 14 seasons with the New York Mets, St. Louis and Atlanta, Torre guided the Yankees to the postseason in all 12 of his years in New York with a cool, patient demeanor. His popularity rankled Steinbrenner.

"George Steinbrenner changed my life giving me that opportunity at the end of '95," said Torre, the seventh Yankees manager to be elected to the Hall. "He just wanted to win. He felt he owed it to the city. Maybe, the fact I was a New Yorker, it really struck a nerve with me."

Torre finished his career by leading the Los Angeles Dodgers to two NL West titles in three seasons, retiring after 2010 with a record of 2,326-1,997. He's the only manager to have more than 2,000 hits as a

player — he was the 1971 NL MVP — and 2,000 wins in the dugout.

"Joe taught a lot of us about how to win the right way and lose the right way," La Russa said.

The savvy La Russa won World Series titles with Oakland in 1989 and with St. Louis in 2006 and '11, retiring days after beating the Texas Rangers in a seven-game thriller. Of the nine managers with three or more World Series titles, the other seven all have been inducted.

La Russa finished with the third-most wins by a manager in a career that began with the Chicago White Sox in 1979 and ended with a record of 2,728-2,365.

"I miss the winning and losing," La Russa said. "Someday I'll be with a team, I think. I'd like to be part of the competition again."



AP photo
Retired managers, from left, Tony La Russa, Joe Torre and Bobby Cox gather for a photo after it was announced that they were unanimously elected to the Baseball Hall of Fame, at a news conference during MLB winter meetings in Lake Buena Vista, Fla., on Monday.

Cox's managerial career began in 1978 with Atlanta, but he was fired after four seasons — only one above .500. A four-year run in Toronto ended in 1985

with an AL East title, and Ted Turner lured him back to the Braves as their GM. Cox returned to the dugout in 1990, and following one losing season he went on

one of the most successful regular-season runs by any skipper, leading the Braves to 14 straight division titles and a World Series championship in 1995.

Halladay

From page 1B

"But when the squirmed runs across home plate while your team is trying to pitch, there is nothing you can do about that. So you really start to realize there are a lot of things out of your control. It takes more than nine guys. It takes nine guys, and it takes the 25 on the roster. It takes the coaches, the staff, and it takes a lot of luck."

Halladay played for the Phillies from 2010-13, going to feel good and I wasn't going to let it be the way I wanted was frustrating. I tried to give everything I can but something was holding me back. I felt I couldn't give them what I wanted to."

13. He was 15-13 with a 5.15 ERA in 38 starts.

Halladay had shoulder surgery during the season and returned in September, but clearly wasn't right. He was 4-5 with a 6.82 ERA in 13 starts this year.

"It's so much fun to play the game and go out and compete," he said. "I looked forward to that fifth day more than anything. To go out there and know it's not going to feel good and I wasn't going to let it be the way I wanted was frustrating. I tried to give everything I can but something was holding me back. I felt I couldn't give them what I wanted to."

Halladay played for the Phillies from 2010-13, going to feel good and I wasn't going to let it be the way I wanted was frustrating. I tried to give everything I can but something was holding me back. I felt I couldn't give them what I wanted to."

Halladay was 203-105 with a 3.38 ERA in 416 career games, including 390 starts. He had 67 complete games and 20 shutouts. His resume includes three 20-win seasons, eight All-Star games, and three other top-3 finishes for the Cy Young Award.

Known as a workhorse, Halladay led the league in innings four times and in complete games seven times.

Despite Halladay's decline, the Phillies were still interested in bringing him back for another year if he was healthy and at a price much lower than the \$20 million he earned in each of the last three seasons. He was a popular teammate and a valued presence in the clubhouse for his influence and strong work ethic.

"Roy Halladay is the ultimate competitor," second baseman Chase Utley said. "He is by far the hardest worker that I've ever seen and treated every game as if it were his last. It was no coincidence why he was the best pitcher of his era. I'm honored to have had the opportunity to watch him pitch for four years. I'll miss his presence and passion but, most of all, I will miss his intensity."

Halladay was a six-time All-Star, won the 2003 AL Cy Young Award and went in 12 seasons with the Blue Jays. He was traded to the Phillies after the 2009 season, and was 40-16 with a 2.40 ERA in his first two years in Philadelphia. But back and shoulder issues limited Halladay in 2012-

quarterback was being touted as a major event in the spring and he has surpassed the hype. The Alabama native is on pace to break the NCAA record for passer efficiency rating (190.1) and has already set records for yards passing (3,820) and TD passes (38) for a freshman.

Heisman

From page 1B

McCarron completed 67 percent of his passes for 2,676 yards and 26 touchdowns for the fourth-ranked Crimson Tide (11-1).

"This will be my first trip to New York City, and I can't put into words how much it means to me," McCarron said in a

statement released by the school. "I am truly privileged to have the opportunity to represent our team at the Heisman ceremony. None of this would be possible without my coaches and teammates."

Mason helped No. 2 Auburn reach the BCS title game, running for

304 yards and four TDs in the SEC championship game. He is ninth in the country in rushing (124 ypg).

"When I heard the news, I was in disbelief," Mason said in a statement. "For me to be invited to the Heisman ceremony, I am honored and blessed. I

couldn't have done it without my teammates; this is an honor for all of them also."

Williams is the nation's leading rusher at 175 yards per game and the 16th player in FBS to run for 2,000 yards in a season.

Winston's arrival at Florida State's starting

quarterback was being touted as a major event in the spring and he has surpassed the hype. The Alabama native is on pace to break the NCAA record for passer efficiency rating (190.1) and has already set records for yards passing (3,820) and TD passes (38) for a freshman.

Exclusively on **LUZERNE COUNTY COUNCIL MEETING**

Service Electric
CABLE TV & COMMUNICATIONS
Channel 19
570-825-8508 • www.sectv.com

LIVE!
Tonight at 6:30 pm
Replay
Sunday at 8:00 pm

If you are a JUVENILE who appeared before former Judge Mark A. Ciavarella Jr. at any time from January 1, 2003 through May 28, 2008

— or —

If you are the PARENT/GUARDIAN of a JUVENILE who appeared before former Judge Ciavarella during this time,

YOU COULD RECEIVE BENEFITS FROM A SETTLEMENT with PA Child Care, LLC; Western PA Child Care, LLC; and Mid Atlantic Youth Services Corp.

A partial settlement has been entered into on behalf of juvenile and parent/guardian Settlement Class Members with PA Child Care, LLC ("PACC"), Western PA Child Care, LLC ("WPACC"), and Mid Atlantic Youth Services Corp. ("MAYS") (referred to in this notice as the "Provider Defendants"). The Provider Defendants will pay \$2.5 million into a Cash Settlement Fund in three installments. This Notice is a description of important terms of the Master Settlement Agreement ("MSA" or "Agreement"), but it does not set forth every term of that Agreement or modify that Agreement. You may obtain a copy of the entire MSA or the Mailed Notice with more detail at www.kidsvinsettlement.com.

HOW DO I RECEIVE A PAYMENT?

You must submit a Proof of Claim form to the Claims Committee in order to receive a payment. You will also have to sign a Release Form to authorize the Claims Committee to order records to verify your information and calculate your payment.

The Proof of Claim Form must be mailed so that it is physically received by the Claims Committee by the Proof of Claim deadline: January 21, 2014. You will not be permitted to participate in the Settlement if you miss this deadline.

HOW MUCH WILL I RECEIVE?

Settlement Class Category	Base Award
1. Probation Only	1 Point*
2. Non-PACC/WPACC	2 Points*
[if you were adjudicated & placed in a facility other than PACC/WPACC]	
3. PACC/WPACC.....	5 Points*
[if you were adjudicated and placed in PACC and/or WPACC for any period of time, you fall in this category]	
* The value of each point will depend on the number of Juvenile Class Members who participate in the Settlement. The total number of points for all Juvenile Settlement Class Members will be divided into the Juvenile Fund to determine the monetary value of each point.	
4. Parents/Guardians	actual amount paid**
**Parents/guardians will only be reimbursed for payments made in their name for which they have not yet received compensation. If the actual amount of awards exceeds the amount allotted for parents/guardians under the plan of allocation, parent/guardian will receive a pro-rata share of their actual award. See www.kidsvinsettlement.com for complete explanation.	

WHAT ARE MY OTHER OPTIONS?

If you do not want to be legally bound by this settlement, you must exclude yourself — or opt-out — by the Proof of Claim deadline: January 21, 2014. If you opt-out, you cannot get money from this settlement and may continue individually to proceed against the Provider Defendants. If you want to be included in the settlement but do not agree to all the terms, you can object. The complete Notice describes how to opt-out or object.

FOR COMPLETE INFORMATION

For more information, visit www.kidsvinsettlement.com, call toll-free 1-866-510-3030, or write to:

Provider Defendants Settlement Claims Committee
Anapol Schwartz
1710 Spruce Street, Philadelphia, PA 19103

Exhibit “B”

The Citizens Voice (Under act P.L. 877 No 160. July 9,1976)
Commonwealth of Pennsylvania, County of Luzerne

DOVER STRATEGY GROUP
43 L STREET
LOTAWANNA MO 64086

Account # 558603
Order # 81400749
Ad Price: 630.00

CIAVARELLA SETTLEMENT

Gina Krushinski

Being duly sworn according to law deposes and says that she is Billing clerk for The Citizens Voice, owner and publisher of The Citizens Voice, a newspaper of general circulation, established in 1978, published in the city of Wilkes-Barre, county and state aforesaid, and that the printed notice or publication hereto attached is exactly as printed in the regular editions of the said newspaper on the following dates:

12/11/2013

Affiant further deposes and says that neither the affiant nor The Citizens Voice is interested in the subject matter of the aforesaid notice or advertisement and that all allegations in the foregoing statement as time, place and character or publication are true Gina Krushinski

Sworn and subscribed to before me
this 11th day of December A.D., 2013

Sharon Ventura

(Notary Public)

