

Exhibit “H”

**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.	:	

2. I am an attorney in good standing and am duly licensed and admitted to the Bars of the Commonwealth of Pennsylvania, the Supreme Court of the United States of America, the United States Court of Appeals for the Third Circuit, the United States District Court for the Eastern District of Pennsylvania and the United States District Court for the Middle District of Pennsylvania. The facts set forth in this Declaration are based upon personal knowledge, about which I could and would testify competently if called upon to do so.

3. HASPS has acted as counsel to the named plaintiffs in *H.T.* since the case's inception. It was appointed Class Counsel by this Court on February 28, 2012, when the Court preliminarily approved the pending settlement with PA Child Care, LLC; Western PA Child Care, LLC; and Mid-Atlantic Youth Services Corp. (the "Provider Defendants"). HASPS has performed the following services, among others, in this matter: investigation; legal and factual research in support of the Plaintiffs' claims; briefing of various motions; review, coding and analysis of documents produced in this litigation; participation in mediation and settlement discussions; drafting settlement documents; and participation in the claims and administration process.

4. HASPS' services in this litigation have been rendered on a wholly contingent basis and compensation will be limited to such amounts as may be

awarded by the Court as common benefit attorneys' fees and for reimbursement of costs and expenses.

6. In connection with the prosecution of this litigation against Provider Defendants, including in particular the administration of the settlement with Provider Defendants—HASPS incurred expenses of \$12,586.94 through May 28, 2014. These expenses are categorized on the chart attached hereto as Exhibit "B." None of these expenses has been reimbursed to date. HASPS recorded these expenses as they were incurred, and they are reflected in its computerized bookkeeping records which were created from invoices, receipts and other proofs of the charges and payments that HASPS maintains.

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



Daniel Segal

Dated: May 28, 2014

EXHIBIT A

HANGLEY ARONCHICK SEGAL PUDLIN & SCHILLER

The Firm

Founded in 1994, Hangley Aronchick Segal Pudlin & Schiller (“HASPS”) has built a national reputation for excellence. With offices in Philadelphia, Harrisburg and Norristown, Pennsylvania and Cherry Hill, New Jersey, the 48-lawyer firm offers a broad range of legal services. The sophistication of matters handled by the firm, the roster of its clients and the quality of its work belie the firm’s relatively small size. The firm has been able to attract the most highly qualified attorneys, both at the entry level and laterally. The firm includes two former Philadelphia City Solicitors; one former United States Supreme Court clerk; several Fellows of the American College of Trial Lawyers, the American College of Bankruptcy, and the American College of Real Estate Lawyers; a former Chancellor of the Philadelphia Bar Association; a Chair-Elect of the ABA’s Section of Environment, Energy, and Resources; members of the American Law Institute; and adjunct faculty members at area law schools. The firm’s lawyers have been singled out by publications such as *Chambers USA: America’s Leading Lawyers for Business* and *The Best Lawyers in America*. The great majority of Hangley Aronchick’s trial lawyers have clerked on federal courts of appeals or district courts.

The firm's litigation practice is composed of a wide variety of representations. The firm represents both plaintiffs and defendants in both civil and criminal matters. Its clients include governmental entities, large corporations, small businesses and individuals. The firm has the energy, enthusiasm and resources to respond quickly to a client's immediate needs and has the dedication, stamina, and personnel necessary to see clients through complex or extended litigation. In every case, the firm makes efficient and effective use of our highly skilled professionals and staff to ensure that the client's resources are conserved. While the firm's attorneys often serve as counsel in court, they are equally comfortable advocating and negotiating behind the scenes to obtain a positive resolution. Also, because many of the firm's cases have been highly publicized, its litigators are experienced in handling public attention along with the demands of the litigation itself.

The firm has considerable expertise in both bringing and defending a broad range of class action suits in federal and state courts. It has served as lead counsel in large, financially significant cases, and its lawyers have succeeded in litigating class action suits in various industries. By way of example, the firm represented one of North America's largest producers of OSB (a lumber product similar to plywood) in multiple antitrust class action cases alleging a multiyear price-fixing conspiracy and seeking billions of dollars in damages. The cases were subject to an

aggressive discovery and class certification schedule that required the firm to coordinate the production of multiple terabytes of information electronically, take and defend depositions across North America, and coordinate with other defense counsel regarding experts, all on an expedited basis. The parties subsequently engaged in settlement negotiations, which ultimately resolved the cases. The firm has served as co-counsel, lead counsel, or local counsel in several class action securities fraud suits over the last decade and also has represented the lead defendant, a Pennsylvania-based health maintenance organization, in a civil RICO putative class action filed in the Eastern District on behalf of more than 6,000 doctors and other health professionals who were providers for the HMO.

The firm has considerable experience in litigating civil rights matters, including the defense of civil rights cases filed against the City of Philadelphia and other governmental officials and entities and the representation of the class of juveniles directly affected by the Luzerne County judicial scandal. The firm is also familiar with the interplay between civil and criminal matters, as it is regularly retained to represent institutions, businesses, and individuals in federal and state criminal matters, many of which involve parallel civil proceedings.

Shareholder In Charge Of This Case

Daniel Segal

Daniel Segal is a founding shareholder of HASPS. His practice includes civil litigation involving defamation, First Amendment, civil rights, intellectual property, health care, professional ethics, education, securities, antitrust, academic research misconduct, and employment. He has been counsel in a number of class actions. Mr. Segal has served for many years as Chair of HASPS' Litigation Department; the department recently was named by *The Legal Intelligencer* as the 2012 Pennsylvania Litigation Department of the Year in the general litigation, mid-sized firm category.

Mr. Segal is a 1973 magna cum laude graduate of Harvard Law School, where he was Executive Editor of the Harvard Law Review. Mr. Segal received his BA magna cum laude in 1968 from Yale University. In 1969, he received a master's degree in international relations from the London School of Economics. From 1974 to 1975, Mr. Segal served as law clerk to the Honorable David Bazelon, Chief Judge of the United States Court of Appeals for the District of Columbia Circuit. From 1975 to 1976, he served as law clerk to the Honorable Thurgood Marshall, Associate Justice of the United States Supreme Court. From 1976 to 1979, Mr. Segal was Assistant Professor of Law at the University of Pennsylvania Law School, teaching among other subjects, civil procedure and

juvenile justice. After entering private practice, he was the Thomas A. O'Boyle Adjunct Professor of Law at the Law School and taught constitutional law there on a regular basis.

Representative clients of Mr. Segal have included Ally Financial, Inc.; Anderson Kill & Olick; Charter Consolidated, Inc.; Chimeric Therapies, Inc.; Chromatex, Inc.; City of Philadelphia; Clear Channel, Inc.; Drexel University; General Dynamics American Overseas Marine; General Refractories Company; Matflex, Inc.; Metroweek, Inc.; Philadelphia City Paper; Parmalat, Inc.; SGL AG; St. Jude Children's Research Hospital, Inc.; Temple University; Wal-Mart Stores, Inc.; and Wellman Industries. His representative cases include the following:

- *Braun v. Wal-Mart Stores, Inc.*, (No. 32 EAP 2012) (Class action currently pending before Pennsylvania Supreme Court)
- *Executive Risk Indemnity Corp. v. Cigna Corp.* (No. 1117 E.D. Pa. 2012)(Currently pending before Pennsylvania Superior Court)
- *University of Pennsylvania v. St. Jude Children's Research Hospital* (E.D. Pa. No. 12-4127)
- *Guerra v. Redevelopment Authority of Philadelphia*, 27 A.3d 1284 (Pa. Super. 2011)
- *Phillips v. Selig*, 959 A.2d 420 (Pa. Super. 2008)
- *In Re: OSB Antitrust Litigation* (E.D. Pa., 06-cv-00826) (Class action)
- *General Refractories Co. v. Fireman's Fund Ins. Co.*, 806 A.2d 469 (Pa. Super. 2002)
- *Computer Aid, Inc. v. Hewlett Packard Co.*, 56 F. Supp. 2d 526 (E.D. Pa. 1999)

- *Conrail v. United States*, 883 F. Supp. 1565 (Sp. Ct. R. R. R. A. 1995)
- *McDermott v. Biddle*, 647 A.2d 514 (Pa. 1994)
- *United States v. American Color & Chemical Corp.*, 858 F. Supp. 445 (M.D. Pa. 1994)
- *United States v. Chromatex, Inc.*, 832 F. Supp. 900 (M.D. Pa. 1993)
- *Lutz v. Chromatex, Inc.*, 730 F. Supp. 1328 (M.D. Pa. 1990)
- *Nazarewych v. Bell Asbestos Mines, Ltd.*, 19 Phila. 429 (Pa. Super. 1989)
- *Craig v. Lake Asbestos of Quebec, Ltd.*, 843 F.2d 145 (3d Cir. 1988)
- *Goodman v. Lukens Steel Co.*, 482 U.S. 656 (1987) (Class action)
- *Strick Corp. v. AJF Warehouse Dist., Inc.*, 532 F. Supp. 951 (E.D. Pa. 1982)

Mr. Segal is admitted to practice in the Bars of the Commonwealth of Pennsylvania and District of Columbia, as well as the United States Supreme Court, United States Court of Appeals for the Third Circuit, United States District Court for the Eastern District of Pennsylvania, and United States District Court for the Middle District of Pennsylvania.

Mr. Segal's recent publications include *Indicting "Invective" in the Internet Age: United States v. Cassidy*, BNA United States Law Week, March 13, 2012 (with John T. Stinson), and *U.S. Supreme Court's Splintered Decision on State Voter ID Law: More Questions Than Answers*, The Legal Intelligencer and

Pennsylvania Law Weekly, Litigation Supplement, July 14, 2008 (with John S. Stapleton). His teaching and lecturing has included the following:

- “The Developing Relationship Between Insurance Claims Executives and Outside Counsel,” Computer Services Corporation Claims Executive Forum, 2007
- “Philadelphia’s Legal Crisis,” Outdoor Advertising Association of America, 2006
- “What’s at Stake in the Upcoming Supreme Court Term,” 2005
- “Federalism,” Philadelphia Bar Association, 1998
- “Federal Discovery,” Philadelphia Bar Association, 1997
- “Federal Written and Oral Discovery,” Philadelphia Bar Association, 1996
- “Confidentiality Orders,” Philadelphia Bar Association, 1995
- “Public Access to Judicial Records,” Philadelphia Bar Association, 1994

Mr. Segal is a past president (2000-2002) of Juvenile Law Center. He has also been active in the Philadelphia Bar Association, having served as Chair of its Commission on Judicial Selection and Retention. He is a Master of the Bench of the University of Pennsylvania Law School American Inn of Court. Other professional associations and memberships include the following:

- American Bar Association
- Pennsylvania Bar Association
- Bar Association of the Third Federal Circuit
- International Board Member, New Israel Fund, 2007-Present

- Vice President, Hillel of Greater Philadelphia, 2003 – Present
- President, University of Pennsylvania Hillel, 2005-Present
- President, Auerbach Central Agency for Jewish Education, 1998-2000
- President, Akiba Hebrew Academy, 1993-1995
- Co-Chair, Soviet Jewry Council of Philadelphia, 1983-1986

Chief Associate On This Case

Rebecca S. Melley

Rebecca S. Melley, an associate in the firm's litigation department, is a 2007 graduate of the University of Pennsylvania Law School, *summa cum laude*, where she was an articles editor for the *University of Pennsylvania Law Review* and an Arthur Littleton and H. Clayton Louderback Legal Writing Instructor. Before joining HASPS, she clerked for the Honorable William H. Yohn Jr., United States District Court for the Eastern District of Pennsylvania. In 2012, 2013, and 2014, she was named by Pennsylvania Super Lawyers magazine as a Rising Star as the result of a statewide survey of lawyers.

Ms. Melley is admitted to the Bars of the Commonwealth of Pennsylvania and State of New Jersey, the United States Court of Appeals for the Third Circuit, the United States District Court for the Eastern District of Pennsylvania, and the United States District Court for the Middle District of Pennsylvania. She has experience litigating in both federal and state courts, and she has been active with

cases in areas including civil rights, intellectual property, insurance coverage, real estate issues, and general commercial litigation.

Ms. Melley graduated *magna cum laude* and *Phi Beta Kappa* from Brown University in 2004 with a degree in Public Policy and American Institutions.

EXHIBIT B

Summary of Expenses for Hangley Aronchick Segal Pudlin & Schiller

Expense Category	Amount
Outside Professional Services and Expert Opinion – Accounting Expert	\$4,192.50
Transcripts of Testimony	\$2,766.00
Duplicating	\$3,245.62
Auto/Cab Fare	\$385.21
Hotel	\$69.93
Overtime	\$1,263.06
Meals	\$636.93
Messenger/Delivery Service	\$27.69
TOTAL	\$12,586.94