

Exhibit "I"

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

FLORENCE WALLACE, ET AL.	:	CONSOLIDATED TO:
Plaintiffs,	:	
v.	:	CIVIL ACTION NO. 3:09-cv-0286
ROBERT J. POWELL, ET AL.	:	
Defendants.	:	(JUDGE CAPUTO)
.....		
WILLIAM CONWAY, ET AL.	:	
Plaintiffs,	:	CIVIL ACTION NO. 3:09-cv-0291
v.	:	
MICHAEL T. CONAHAN, ET AL.	:	(JUDGE CAPUTO)
Defendants.	:	
.....		
H.T., ET AL.	:	
Plaintiffs,	:	CIVIL ACTION NO. 3:09-cv-0357
v.	:	
MARK A. CIAVARELLA, ET AL.	:	(JUDGE CAPUTO)
Defendants.	:	
.....		
SAMANTHA HUMANIK,	:	
Plaintiffs,	:	CIVIL ACTION NO. 3:09-cv-0630
v.	:	
MARK A. CIAVARELLA, JR., ET AL.	:	(JUDGE CAPUTO)
Defendants.	:	

**DECLARATION OF MARSHA LEVICK IN SUPPORT OF
PLAINTIFFS' UNOPPOSED MOTION FOR
FINAL APPROVAL OF SETTLEMENT, AWARD OF ATTORNEYS'
FEES, COSTS AND INCENTIVE PAYMENTS TO NAMED PLAINTIFFS**

Filed on Behalf of Juvenile Law Center

I, Marsha Levick, hereby declare as follows:

1. I am the Deputy Director, Chief Counsel and co-founder of Juvenile Law Center. I have been the lead attorney at Juvenile Law Center for the above-captioned litigation since its inception. I submit this Declaration in Support of Plaintiffs' Unopposed Motion for Final Approval of Settlement, Award of Attorneys' Fees, Costs and Incentive Payments to Named Plaintiffs in H.T., et al. v. Mark A. Ciavarella, et al., U.S.D.C., M.D. Pa., Civil Action No. 3:09-cv-0357. Attached hereto as Exhibit "A" is my resume.

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 Second Circuit, 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. I am also admitted to practice before the United States Courts of Appeals for the Sixth and Seventh Circuits, as well as the United States Court of Appeals for the District of Columbia Circuit. 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.

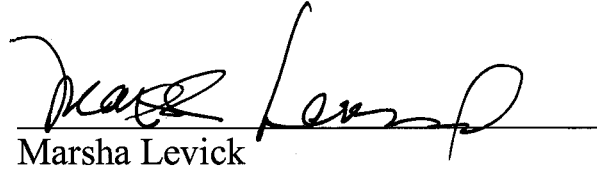
3. Juvenile Law Center has acted as counsel to the named plaintiffs in H.T. since the case's inception; Juvenile Law Center also acted as counsel for the Petitioners in In re J.V.R., No. 81 M.M. 2008, the King's Bench proceeding before the Pennsylvania Supreme Court which led to the vacatur, dismissal with prejudice, and expungement of all of the juvenile delinquency adjudications of the class of juvenile plaintiffs herein. Juvenile Law Center was appointed Class Counsel by this Court in this proceeding on November 27, 2013, when it preliminarily approved the pending settlement with the Mericle defendants. Juvenile Law Center 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. Juvenile Law Center's compensation for its work in this matter 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.

5. In connection with the prosecution of this litigation against Provider Defendants, including in particular the administration of the settlement

with Provider Defendants— Juvenile Law Center incurred expenses of \$8,047.76 through May 20, 2014. These expenses are categorized on the chart attached hereto as Exhibit “B.” None of these expenses has been reimbursed to date. Juvenile Law Center 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 Juvenile Law Center maintains.

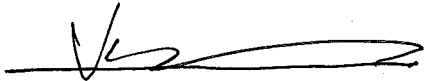
I declare under penalty of perjury that the foregoing is true and correct.


Marsha Levick

Dated: 5/22/14

Sworn to and subscribed before me

this 22nd day of May, 2014.



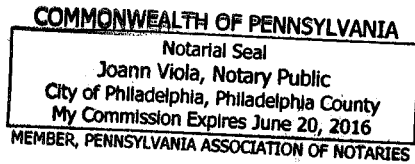


EXHIBIT A

RESUME

Marsha L. Levick, Esq.

Juvenile Law Center
1315 Walnut Street
Suite 400
Philadelphia PA 19107
215-625-0551

BAR MEMBERSHIP AND ADMISSIONS

Supreme Court of Pennsylvania
United States Supreme Court
United States Court of Appeals for the Second Circuit
United States Court of Appeals for the Third Circuit
United States Court of Appeals for the Sixth Circuit
United States Court of Appeals for the Seventh Circuit
United States Court of Appeals for the District of Columbia Circuit
United States District Court, Eastern District of Pennsylvania
United States District Court, Middle District of Pennsylvania

EMPLOYMENT

Juvenile Law Center, Philadelphia, Pa. (1975-1982; 1995-present)

Co-Founder, Deputy Director and Chief Counsel

Manage and supervise JLC's federal and state litigation and appellate docket, including civil rights class actions on behalf of children in the juvenile justice and child welfare systems, preparation of amicus briefs before the United States Supreme Court and other federal and state appellate courts; oral arguments before Pennsylvania state and federal courts as well as state and federal appellate courts throughout the country. Other responsibilities include individual client representation; public policy and legislative analysis on children's rights issues, including juvenile justice, delinquency and conditions of confinement; child welfare, abuse and neglect; education and special education; physical and mental health; training and public education; media.

University of Pennsylvania Law School, Philadelphia, Pa. (2000 - present)

Lecturer, Appellate Advocacy I

Temple University Beasley School of Law, Philadelphia Pa.

Instructor (Adjunct Faculty), Legal Research and Writing (1998-2000); Juvenile Justice (2000- present)

Rutgers University School of Law, Camden, N.J.

Adjunct Faculty, Juvenile Justice Seminar (2002)

Rubin & Associates, Paoli, Pa. (1989-1995)

Associate with litigation firm specializing in the enforcement of employment contracts, restrictive covenants, and trade secrets, primarily in the securities industry, as well as some employment discrimination and wrongful termination cases. Extensive motion practice before state and federal courts; securities industry arbitrations; and state and federal appellate practice.

NOW Legal Defense and Education Fund, Inc. New York, New York. (1982-1988)

Executive Director (6/86-12/88): Overall management and supervision of administration and finance; fundraising; program development and strategic planning; public speaking, public education and media relations

Legal Director (9/82-6/86): Development and implementation of litigation strategies and programs, including development of sex discrimination in insurance project, expansion of Title VII litigation docket, coordinating amici in all affirmative action cases before the U.S. Supreme Court 1982-1987, and expansion of family law docket with particular emphasis on economic consequences of divorce; administration of Legal Department budget; supervision of staff; liason to principal funders of legal department; media relations.

Temple University Philadelphia, Pa. (1/81-5/82)

Instructor, Criminal Justice Department. Courses taught included Introduction to Juvenile Justice and Women in the Criminal Justice System.

EDUCATION

Temple University Beasley School of Law, Philadelphia, Pa.
J.D. *Cum Laude* 1976;
University of Pennsylvania, Philadelphia, Pa.
B.A. History 1971

OTHER LAW-RELATED ACTIVITIES

Philadelphia Bar Association

Member, Board of Governors, 2004-2006
Member, Public Interest Section Executive Committee 1999 -2008
Treasurer, Public Interest Section Executive Committee 2001

Vice-Chair, Public Interest Section Executive Committee 2002
Chair, Public Interest Section Executive Committee 2003
Member, Chancellor's Committee to Implement Recommendations of Race and Gender
Bias Report 2003
Co-Chair Women's Rights Committee 2008

Pennsylvania Bar Association

Member of Philadelphia Delegation 2007-2009

BOARD MEMBERSHIPS

Dean's Council, Indiana University School of Public and Environmental Affairs
Juvenile Justice Project of Louisiana, New Orleans, La. (Board Chair)
Southern Poverty Law Center, Montgomery Al
Advisory Committee, Juvenile Justice Clinic, Rutgers – Camden, NJ Law School
Advisory Board, Center for Wrongful Convictions-Youth, Northwestern University
School of Law
Advisory Board, Bloomberg BNA Criminal Law Reporter
Advisory Committee, Campaign for Fair Sentencing of Youth (Washington DC)

HONORS AND AWARDS

- Temple University's Women's Law Caucus Professional Achievement Award (2006)
- Pennsylvania Bar Association Child Advocate of the Year Award (2008)
- Foundation for the Improvement of Justice Award (2009)
- Philadelphia Bar Association's Andrew Hamilton Award (2009)
- Philadelphia Inquirer Citizen of the Year (2009) (co-recipient)
- The Forward 50 (2009)
- American Association for Justice Leonard Weinglass Award (2010)
- American Bar Association Livingston Hall Award (2010)
- Rutgers-Camden Black Law Student Association Champion of Justice Award (2010)
- The Legal Intelligencer, Women of Distinction (2010)
- Clifford Scott Green Bill of Rights Award, Federal Bar Association, Philadelphia Criminal Justice Section (2010) (co-recipient)
- Good Shepherd Mediation Program Shepherd of Peace Award (2010)
- Philadelphia Bar Association, Criminal Justice Section Thurgood Marshall Award (2011) (Co-recipient)
- Friends Select School, Distinguished Alumnae Award (2011)

RELEVANT PUBLICATIONS

Marsha Levick, "From a Trilogy to a Quadrilogy: *Miller v. Alabama* Makes It Four in a Row for U.S. Supreme Court Cases That Support Differential Treatment of Youth," *Criminal Law Reporter*, 91 CrL 748, 09/12/2012.

Marsha Levick, Jessica Feierman, Sharon Messenheimer Kelley, Naomi Sevin Goldstein, "The Eighth Amendment Evolves: Defining Cruel And Unusual Punishment Through The Lens Of Childhood And Adolescence," *University of Pennsylvania Journal of Law and Social Policy*, Vol. 15, No. 2 (Spring 2012)

Marsha L. Levick and Elizabeth-Ann Tierney, "The United States Supreme Court Adopts A Reasonable Juvenile Standard In *J.D.B. v. North Carolina* For Purposes Of The *Miranda*: Custody Analysis: Can A More Reasoned Justice System For Juveniles Be Far Behind?" *Harvard Civil Rights –Civil Liberties Law Review*, Vol. 47, No.2 (Spring-Summer 2012)

Marsha Levick, "*J.D.B. v. North Carolina*: The U.S. Supreme Court Heralds the Emergence of the 'Reasonable Juvenile' in American Criminal Law," *The Criminal Law Reporter*, 89 CrL 753, 08/24/11.

Robert Schwartz and Marsha Levick, "When A 'Right' Is Not Enough: Implementation Of The Right To Counsel In An Age Of Ambivalence," *Criminology & Public Policy*, Vol. 9, Issue 2, 2010.

Marsha Levick, "Kids Really Are Different: Looking Past *Graham v. Florida*," *Criminal Law Reporter*, Vol. 87, No. 14, 2010.

Marsha Levick and Kristina Moon, "Prosecuting Sexting as Child Pornography: A Critique," *Valparaiso University Law Review*, Vol. 44, No. 4, Summer 2010.

Jessica Feierman, Marsha Levick, and Ami Mody, "The School to Prison Pipeline ... and Back: Obstacles and Remedies for the Re-Enrollment of Adjudicated Youth," *New York Law School Law Review*, Vol. 54, No. 4, 2009/10.

Marsha Levick and Robert G. Schwartz, "Changing the Narrative: Convincing Courts to Distinguish Between Misbehavior and Criminal Conduct in School Referral Cases," *University of the District of Columbia Law Review*, Vol. 9, No. 1, Winter 2007.

Marsha Levick and Neha Desai, "Still Waiting: The Elusive Quest to Ensure Juveniles a Constitutional Right to Counsel at All Stages of the Juvenile Court Process," *Rutgers Law Review*, Vol. 60, No. 1, Fall 2007.

Nina W. Chernoff and Marsha Levick, "Beyond the Death Penalty: Implications of Adolescent Development Research for the Prosecution, Defense, and Sanctioning of Youthful Offenders," *Clearinghouse Review: Journal of Poverty Law and Policy*, July 2005.

Marsha Levick and Francine T. Sherman, "When Individual Differences Demand Equal Treatment: An Equal Rights Approach to the Special Needs of Girls in the Juvenile Justice System," *Wisconsin Women's Law Journal*, Vol. 18, No. 1, Spring 2003.

EXHIBIT B

Summary of Expenses for Juvenile Law Center

Expense Category	Amount
Outside Professional Services and Expert Opinion – Accounting Expert	\$4,192.50
Transcripts of Testimony	\$816.60
Document Costs and Duplicating	\$1,033.90
Travel Expenses	\$1,415.99
Meeting Space Rental for Client Meeting	\$291.50
Shipping/Delivery Service	\$297.27
TOTAL	\$8,047.76