

CIRCUIT COURT OF COOK COUNTY
CHANCERY DIVISION - MOTION CALL RECEIPT

CASE NUMBER : 15CH01456

CALENDAR : 10

ATTORNEY : 58859

P/D : P

PLAINTIFF NAME : CHANCY HARRISON

DEFENDANT NAME : ILLINOIS PRISONER REVIEW

MOTION CALL DATE : 033115

MOTION CALL SQNO : 003

MOTION CALL TIME : 0930

PLEASE TAKE NOTICE that on Tuesday, March 31, at 9:30 a.m., we will appear before The Honorable Thomas B. Allen, in courtroom 2302, at the Circuit Court of Cook County, Chancery Division, Richard J. Daley Center, and will then and there present the attached *Motion for Class Certification*.

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that he served the foregoing by placing a copy in the U.S. Mail, before the hour of 5 p.m. on Friday, March 20, to:

Kevin Lovellette, Assistant Attorney General
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David M. Shapiro

**IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, CHANCERY DIVISION**

HARRISON CHANCY,	)	
individually and as representative of	)	
the class of "C-number" prisoners,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	No. 2015-CH-01456
ILLINOIS PRISONER REVIEW BOARD,	)	
ADAM MONREAL, Chairman of the	)	Hon. Alan R. Thomas
Illinois Prisoner Review Board,	)	
ILLINOIS DEPARTMENT OF	)	
CORRECTIONS, Salvador Godinez,	)	
Director of the Illinois Department of	)	
Corrections,	)	
	)	
Defendants.	)	

PETITIONERS' MOTION FOR CLASS CERTIFICATION

Plaintiff Harrison Chancy, pursuant to 735 ILCS 5/2-801, by his undersigned attorneys, respectfully moves this court for entry of an order certifying the class of all C-Number prisoners incarcerated in the Illinois Department of Corrections. In support, Petitioners state:

1. Petitioners and the class they seek to represent are C-Number Prisoners. C-Number Prisoners are serving sentences under the statutory scheme that existed before 1979. They are eligible to be considered periodically for parole
2. Here, Petitioners satisfy all the requirements for certification of a class action pursuant to Section 2-801 of the Illinois Code of Civil Procedure, 735 ILCS 5/2-801.
3. *First*, the putative class is so numerous that joinder of all of its members would be impracticable. More than 170 state C-Number Prisoners, of which Mr. Chancy is one, make up

the putative class. (Complaint ¶ 1.) They received sentences of indeterminate duration under the statutory sentencing scheme that existed before 1978, and they remain incarcerated today in the custody of the IDOC. (*Id.* ¶ 2.)

4. *Second*, common questions of fact or law predominate. C-Number Prisoners are entitled under Illinois law to periodic parole eligibility hearings conducted by the PRB, and they can only achieve parole upon a majority vote by the PRB's members. (*Id.* ¶ 3.) The Illinois Crime Reduction Act (the "Act"), 730 ILCS 190/15(b) (West 2010) explicitly requires the IDOC and PRB to use – beginning no later than January 1, 2013 – a standardized risk assessment tool when evaluating C-Number Prisoners for parole. (*See id.* ¶ 4.) Since January 1, 2013, however, the IDOC has not performed risk assessments, and the PRB thus has not used risk assessments at the parole hearings for any of the C-Number Prisoners. (*Id.* ¶ 5.) In short, the Defendants have violated the same statute as to each member of the putative class in the same way.

5. *Third*, the named Petitioner, Harrison Chancy, will fairly and adequately protect the interest of the class. (*Id.* at ¶ 39.) Mr. Chancy is a C-Number Prisoner who has twice been denied parole since January 1, 2013 based on hearings conducted without the use of any standardized risk assessment tool, in direct contravention of the Act. (*Id.* at ¶¶ 16-22.) Further, Mr. Chancy's counsel will fairly and adequately protect the interest of the class; they have extensive experience and success litigating prison-related civil rights cases and will advocate aggressively and tenaciously on behalf of all the class members. (*Id.* at ¶ 42.)

6. *Fourth*, the proposed class action is an appropriate method for adjudicating the rights of the C-Number Prisoners because it will avoid burdening the Circuit Court with separate claims filed by more than 170 C-Number Prisoners and class certification will thus further the interests

of efficiency, judicial economy and justice. (*See id.* at ¶ 41.) The Court should therefore adjudicate the Petitioners' claims on a class-wide basis.

7. Plaintiffs are submitting a memorandum in support of this motion that more fully explains and supports the motion.

WHEREFORE, Plaintiff Harrison Chancy, by his undersigned attorneys, respectfully requests that this court enter an order certifying the class of all C-Number Prisoners incarcerated in the Illinois Department of Corrections.

Respectfully submitted,

HARRISON CHANCY

By: Laura Kleinman
One of his attorneys

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**IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, CHANCERY DIVISION**

HARRISON CHANCY,
individually and as representative of
the class of "C-number" prisoners,

Plaintiff,

v.

ILLINOIS PRISONER REVIEW BOARD,
ADAM MONREAL, Chairman of the
Illinois Prisoner Review Board,
ILLINOIS DEPARTMENT OF
CORRECTIONS, Salvador Godinez,
Director of the Illinois Department of
Corrections,

Defendants.

No. 2015-CH-01456

Hon. Alan R. Thomas

**PLAINTIFFS' MEMORANDUM OF LAW IN
SUPPORT OF HIS MOTION FOR CLASS CERTIFICATION**

Plaintiff Harrison Chancy, pursuant to 735 ILCS 5/2-801, respectfully requests that this Court grant his Motion for Class Certification and submits this memorandum in support. The putative class in this case is composed of individuals who are in the custody of the Illinois Department of Corrections ("IDOC") and serving indeterminate sentences (commonly referred to as "C-Number Prisoners"). C-Number Prisoners are serving sentences under the statutory scheme that existed before 1979. They are eligible to be considered periodically for parole. An Illinois state statute explicitly requires that the IDOC and the Illinois Prisoner Review Board ("PRB") use a standardized risk assessment tool for a variety of purposes, including without limitation when the PRB determines whether to release a prisoner on parole. While C-Number Prisoners have had parole hearings since January 1, 2013, neither the IDOC nor the PRB has

followed the law. The IDOC has not prepared a risk assessment using a standardized risk assessment tool for any C-Number Prisoner, and the PRB has not used a standardized risk assessment tool in any parole hearing for any C-Number prisoner at any parole hearing from January 1, 2013 through the date of filing this Memorandum.

I. ARGUMENT

A. C-Number Prisoners Meet the Requirements for Class Certification under Applicable Law.

The putative class of C-Number Prisoners meets all the requirements for class certification imposed by Illinois law. 735 ILCS 5/2-801 (West 1982). A class should be certified when a court finds that four elements are present: (1) the class is so numerous that joinder of all members is impracticable; (2) there are questions of fact or law common to the class that predominate over questions affecting only individual members; (3) the representative parties will fairly and adequately protect the interest of the class; and (4) the class action is an appropriate method for the fair and efficient adjudication of the controversy. *Id.* The trial court has broad discretion to determine when a proposed class satisfies the requirements for class certification and, when questionable, should favor maintaining class actions for the sake of efficiency and judicial economy. *Ramirez v. Smart Corp.*, 371 Ill. App. 3d 797, 809 (Ill. App. Ct. 2007).

This Court should certify a class of C-Number Prisoners because the four prerequisites to class certification have been met. *First*, the putative class is so numerous that joinder of all of its members would be impracticable. More than 170 state C-Number Prisoners, of which Mr. Chancy is one, make up the putative class. (Complaint ¶ 1.) They received sentences of indeterminate duration under the statutory sentencing scheme that existed before 1978, and they remain incarcerated today in the custody of the IDOC. (*Id.* ¶ 2.)

Second, common questions of fact or law predominate. C-Number Prisoners are entitled under Illinois law to periodic parole eligibility hearings conducted by the PRB, and they can only achieve parole upon a majority vote by the PRB's members. (*Id.* ¶ 3.) The Illinois Crime Reduction Act (the "Act"), 730 ILCS 190/15(b) (West 2010) explicitly requires the IDOC and PRB to use – beginning no later than January 1, 2013 – a standardized risk assessment tool when evaluating C-Number Prisoners for parole. (*See id.* ¶ 4.) Since January 1, 2013, however, the IDOC has not performed risk assessments, and the PRB thus has not used risk assessments at the parole hearings for any of the C-Number Prisoners. (*Id.* ¶ 5.) In short, the Defendants have violated the same statute as to each member of the putative class in the same way.

Third, the named Petitioner, Harrison Chancy, will fairly and adequately protect the interest of the class. (*Id.* at ¶ 39.) Mr. Chancy is a C-Number Prisoner who has twice been denied parole since January 1, 2013 based on hearings conducted without the use of any standardized risk assessment tool, in direct contravention of the Act. (*Id.* at ¶¶ 16-22.) Further, Mr. Chancy's counsel will fairly and adequately protect the interest of the class; they have extensive experience and success litigating prison-related civil rights cases and will advocate aggressively and tenaciously on behalf of all the class members. (*Id.* at ¶ 42.)

Fourth, the proposed class action is an appropriate method for adjudicating the rights of the C-Number Prisoners because it will avoid burdening the Circuit Court with separate claims filed by 170 C-Number Prisoners and class certification will thus further the interests of efficiency, judicial economy and justice. (*See id.* at ¶ 41.) The Court should therefore adjudicate the Petitioners' claims on a class-wide basis.

B. The Putative Class Is So Numerous that Joinder Would Be Impracticable.

Because the putative class exceeds 170 members, numbers alone make joinder impractical. Thus, the "numerosity" requirement of Section 2-801(1) is satisfied. Illinois courts

find classes to be sufficiently numerous when they are so large that it would be impracticable for a court to hear each of the class members' claims individually. *See, e.g., Miner v. Gillette Co.*, 87 Ill. 2d 7, 14 (1981)) (“[A] class action suit is ‘predicated on the inability of a court to entertain the actual appearance of all members of the class, as well as the impracticality of having each member prosecute his or her individual claim.’”). Courts generally find that joinder is impracticable when a class has over 40 members. *Chandler v. Southwest Jeep-Eagle, Inc.*, 162 F.R.D. 302, 307 (“[J]oinder is usually deemed impracticable where the class members number 40 or more.”);¹ *Cruz*, 383 Ill. App. 3d at 768 (determining class of 90 members to be sufficiently numerous); *Arenson v. Whitehall Convalescent and Nursing Home, Inc.*, 164 F.R.D. 659, 662-663 (1996) (certifying class of 159 potential members); *Kulins v. Malco, a Microdot Co., Inc.*, 121 Ill. App. 3d 520, 530 (Ill. App. Ct. 1984) (certifying class of 19 members citing the fact that individual cases filed by each class member would “unnecessarily add to the backlog of cases” in Cook County). The putative class here exceeds 170 prisoners, which is well above the number that satisfies the numerosity requirement.

In addition to sheer numbers, courts consider additional factors that weigh in favor of certifying this class. These factors include “the class members’ geographical distribution, the ability to identify and locate putative class members, the degree of knowledge and sophistication of the class members and their need for protection, the amounts of the claims of individual class members, and the nature of the cause of action.” *Wood River Area Dev. Corp. v. Germania Fed. Savings and Loan Ass’n*, 198 Ill. App. 3d 445, 451 (Ill. App. Ct. 1990); *see also Arenson*, 164

¹ Because the Illinois numerosity requirement is indistinguishable from that of the federal rules, federal case law “will be directly applicable in interpreting and applying it.” Jenner, Tone, & Martin, *Historical and Practice Notes*, S.H.A. 735 ILCS 5/2-801 (West 1982); *see also Cruz v. Unilock Chicago Inc.*, 383 Ill. App. 3d 752, 761 (Ill. App. Ct. 2008) (stating that federal decisions interpreting Rule 23 are persuasive authority with regard to questions of class certification in Illinois).

F.R.D. at 662-663 (“When analyzing whether joinder is impracticable, so that numerosity requirement of class certification is satisfied, factors such as judicial economy, geographic diversity of class members, and the ability of class members to institute individual lawsuits should be considered”). The C-Number Prisoners’ proposed class is comprised of inmates who are dispersed throughout the state and who have been incarcerated in the IDOC for decades. These inmates have limited means and minimal ability to access the courts to individually prosecute their own claims. Yet, the inmates’ statutory right to be evaluated for parole based on standardized measures directly implicates their liberty and warrants utmost protection. The numerosity element is thus satisfied not only because joinder is impracticable, but also in light of the importance of securing the statutory rights of individuals who are not otherwise in a position to secure them.

C. Common Questions of Fact or Law Predominate.

The C-Number Prisoner class also satisfies the “commonality” element of Section 2-801(2). The commonality element requires a showing that (1) there are questions of fact or law common to the class, and (2) the common questions predominate over any questions affecting only individual members. *Walczak v. Onyx Acceptance Corp.*, 365 Ill. App. 3d 664, 673 (Ill. App. Ct. 2003) (finding commonality and predominance where defendants’ unfair practices were common to all putative class members and those common questions dominated over any individual class member concerns). A common question exists when the claims of the individual class members are based on the common application of a statute or when the members of the class are aggrieved by the same or similar conduct. *Ramirez*, 371 Ill. App. 3d at 811-812 (finding commonality in allegations concerning whether or not defendant engaged in deceptive scheme to overcharge hospital patients for receiving medical records); *Walczak*, 365 Ill. App. 3d at 674 (“A

class action may be properly pursued where the defendant allegedly acted wrongfully in the same basic manner as to an entire class, and, in such circumstances, the common class questions predominate the case.”); *See also, Hall v. Sprint Spectrum L.P.*, 376 Ill. App. 3d 822, 831 (Ill. App. Ct. 2007) (finding commonality where defendant phone company acted wrongfully in applying illegal termination penalties to class members).

It is important to note that plaintiff does *not* ask this court to determine whether he (or any member of the putative class) should be granted parole. Rather, he is asking this court solely to order the PRB and the IDOC to use the statutorily mandated standardized risk assessment tool when making parole decisions. Thus, this court need *not* examine the varied facts of each individual member of the class to resolve this case.

Because plaintiff does not seek individualized determinations, the relevant facts are largely identical (and essentially indisputable) for all of the members of the putative class. All putative class members were given sentences of indeterminate duration under the statutory sentencing scheme that existed before 1979. All members of the putative class remain incarcerated today in the custody of the IDOC and are entitled to periodic parole eligibility hearings conducted by the PRB. Further, no C-Number Prisoner has been evaluated using a standardized assessment tool as explicitly required by the Act. *See* 730 ILCS 190/15(b) (West 2010) (IDOC and PRB “shall adopt policies . . . result[ing] in the utilization of a statewide, standardized risk assessment tool across the Illinois criminal justice system.”)

A single common question of law predominates. The C-Number Prisoners seek a class-wide determination with respect to the single common question: whether the IDOC and the PRB have violated – and continue to violate – their statutory duty to use a standardized assessment tool when determining whether to grant C-Number Prisoners parole. Answering this common

question will involve only a determination whether Defendants have violated, and continue to violate, 730 ILCS 190/15(b). The answer will be equally applicable to every class member.

D. Mr. Chancy and his Counsel Will Fairly and Adequately Represent the Class.

The putative class also satisfies the third element of Section 2-801: the representative party will fairly and adequately protect the interests of the class. Mr. Chancy is qualified to represent the C-Number Prisoners, and the C-Number Prisoners' attorneys are competent to protect, the interests of the class.

1. Mr. Chancy Is Qualified to Represent the Interests of the Class.

To adequately represent the interests of a class, a named plaintiff must: (1) have an individual cause of action against the defendant, and (2) not seek relief that is potentially antagonistic to the other class members. *Ramirez*, 371 Ill. App. 3d at 810-811 (holding that plaintiff adequately protected the interest of the class because she could establish elements of individual consumer fraud claim and her interests were aligned with those of absentee class members). In addition, the named plaintiff must not appear to have colluded with the opposing party in bringing the case. *Walczak*, 365 Ill. App. 3d at 675.

Mr. Chancy satisfies these requirements. First, he has a viable claim against the Defendants. Since January 1, 2013, the IDOC and PRB have been expressly required by the Act to use a statewide, standardized risk assessment tool in evaluating the eligibility of C-Number Prisoners for parole and adjudicating their parole hearings. 730 ILCS 190/15(b) (West 2010). Mr. Chancy is a C-Number Prisoner who has had two parole hearings since January 1, 2013; his parole was twice denied without the use of any standardized risk assessment tool. (Compl. ¶¶ 16-22.) Because Mr. Chancy had the right to be evaluated using a standardized risk assessment tool, and because he was plainly denied that right, he has an individual cause of action against the

IDOC and PRB. In addition, because all C-Number Prisoners in the putative class proffer the same claim, his allegations are identical, not antagonistic, to the other class members' allegations. Finally, Mr. Chancy has not colluded with the PRB or the IDOC in bringing this case, nor does any evidence suggest otherwise.

2. The C-Number Prisoners' Counsel Will Adequately Protect the Interests of the Class.

Further, counsel for the C-Number Prisoners will adequately protect the interests of the class because they are "qualified, experienced and generally able to conduct the [present] litigation." *Miner*, 87 Ill. 2d at 14. This team of lawyers has been committed for many years to representing individuals both in criminal proceedings and in injunctive class action proceedings challenging policies and procedures used in the criminal justice system.² Together, the lawyers have decades of knowledge, experience and success bringing class action prisoners' rights cases, related civil rights suits, and litigating state C-Number parole hearings. Moreover, they bring the skills, experience, and resources of some of the preeminent civil rights organizations and competent law firms in the city: the MacArthur Justice Center at Northwestern University, Northwestern University School of Law's Bluhm Legal Clinic, the Center of Wrongful Convictions of Youth at Northwestern University School of Law, the Uptown People's Law Center, and Schiff Hardin LLP. Both Mr. Chancy and counsel for the C-Number Prisoners are therefore adequate and qualified to represent the interests of the class.

E. The Class Action Is an Appropriate Method for Fair and Efficient Adjudication of the Controversy.

Finally, the fourth element of Section 2-801 concerning the fairness of the class action is met. A class action is an appropriate method for the fair and efficient adjudication of the

² The Complaint sets out thoroughly the relevant experience of class counsel. (See February 23, 2015 Shapiro Aff.)

controversy when it can (1) best secure the economies of time, effort, and expense and promote a uniformity of decision, or (2) accomplish the equity and justice that class actions seek to obtain. *Clark v. TAP Pharm. Prods.*, 343 Ill. App. 3d 538, 552 (Ill. App. Ct. 2003). In this case, a class action would achieve both goals. Since January 1, 2013, more than 170 state prisoners have undergone parole hearings that have fallen short of the minimal statutory requirements; although the law could not be more straightforward, the IDOC and PRB have refused to comply with it for more than two years, and have not complied to this day. Combining the claims of the C-Number Prisoners and allowing these prisoners to pursue their statutory rights collectively will promote judicial economy, efficiency, and justice, and avoid burdening the Circuit Court with dozens of separate claims, or potentially burdening the dozens of different Circuit Courts where C-Number Prisoners are housed, each of which would be required to apply the same legal analysis, with the attendant risk of conflicting decisions.

Courts generally determine that this final element of Section 2-801 is satisfied if the first three elements are satisfied. *Hall*, 376 Ill. App. 3d 822 at 833-34 (“Initially, we note that our holding that the first three prerequisites of section 2-801 have been established makes it evident that the fourth requirement has been fulfilled as well.”); *Cruz*, 383 Ill. App. 3d at 780 (where the court used the reasoning of other certification elements to explain that a class action would provide efficiency of time, expense, and judicial resources). As stated above, this case satisfies the first three class certification requirements. Accordingly, the fourth element of Section 2-801, that the class action is appropriate for the fair and efficient adjudication of the controversy is also established.

II. CONCLUSION

Because all four elements of Section 2-801 have been met in this case, this Court should certify the putative class of C-Number Prisoners. Petitioner Chancy therefore respectfully requests that this Court certify the putative class, and conduct all further proceedings with respect to the C-Number Prisoners' claims against the IDOC and the PRB on a class-wide basis.

Respectfully submitted,

HARRISON CHANCY

By: Laura Kleinman
One of his attorneys

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**IN THE CIRCUIT COURT OF COOK COUNTY
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HARRISON CHANCY,
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ILLINOIS PRISONER REVIEW BOARD,
ADAM MONREAL, Chairman of the
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ILLINOIS DEPARTMENT OF
CORRECTIONS, Salvador Godinez,
Director of the Illinois Department of
Corrections,

Defendants.

No. 2015-CH-01456

Hon. Alan R. Thomas

AFFIDAVIT OF DAVID M. SHAPIRO

I, David M. Shapiro, affirm under penalty of perjury, that the following is true and correct to the best of my knowledge, information, and belief:

1. I am an attorney licensed to practice law in the State of Illinois and over 18 years of age.
2. I joined the MacArthur Justice Center at Northwestern University in October 2012 after working as a staff attorney for the ACLU's National Prison Project. The Roderick and Solange MacArthur Justice Center is a public interest law firm founded in 1985 by the family of J. Roderick MacArthur to advocate for human rights and social justice through litigation. The MacArthur Justice Center became part of Northwestern University School of Law's Bluhm Legal Clinic in 2006.
3. In earlier litigation, I obtained what is believed to be the largest settlement ever in a case involving censorship by a prison or jail and led the first major challenge to

Communication Management Units, a new type of federal prison unit designed to radically limit the communications of federal prisoners suspected of links to terrorism. In 2012, I was part of a trial team nominated for the Public Justice “Trial Lawyer of the Year” Award for litigation challenging the segregation of prisoners with HIV in Alabama in a statewide injunctive class action case. I clerked for the late Hon. Edward R. Becker, Third Circuit Court of Appeals and received my JD from Yale Law School. *Id.* ¶ 3.

4. Joshua Tepfer has been working on criminal justice issues in the state of Illinois for over ten years. From 2004-2008, he was an attorney with the First District Office of the Illinois State Appellate Defender, and since 2008 he has been Project Co-Director and Assistant Clinical Professor with the Center on Wrongful Convictions of Youth at Northwestern University School of Law. He has litigated a variety of criminal matters in Illinois state circuit courts and matters involving the Illinois Prisoner Review Board and Department of Corrections. He has been Plaintiff Harrison Chancy’s attorney for more than five years, litigating both his parole case and post-conviction matters in the Circuit Court of Cook County.
5. Alan Mills is the Executive Director of the Uptown People’s Law Center in Chicago, Illinois. He has litigated dozens of civil rights actions brought by prisoners in both federal and state courts, including both individual cases and class actions. Mr. Mills 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. He has 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

Morales v. Monreal, No. 13cv7572 (N.D. Ill.). Additionally, Mr. Mills is one of the counsel appointed to represent the plaintiff class in the following cases, both of which remain pending: *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); and *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). The individual prisoner civil rights cases Mr. Mills had 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).

6. Laura Kleinman is an associate in the Chicago office of Schiff Hardin, LLP. She represents individuals and organizations at the trial and appellate levels in a variety of

complex commercial litigation matters, including shareholder disputes, class actions, government investigations and civil rights. She conducts oral arguments in federal district and appellate courts and carries out discovery, trial preparation, settlement negotiations and mediations. Ms. Kleinman graduated from Harvard Law School (J.D., 2010), where she was the membership director of the Harvard Legal Aid Bureau, and Washington University in St. Louis (B.A. Philosophy, 2007). Prior to joining Schiff Hardin, she was an associate at Robinson, Curley & Clayton, a complex commercial litigation boutique in Chicago.

Respectfully Submitted,


DAVID M. SHAPIRO

Sworn before me this

23 day of February, 2015



Notary Public

