

**UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT**

RICHARD WEST AND JOSEPH
BRUYETTE, individually and on behalf of a
class of similarly situated persons;

Plaintiffs,

v.

AL GOBEILLE, Vermont Secretary of
Human Services, MARTHA MAKSYM,
Vermont Deputy Secretary of Human
Services, MICHAEL TOUCHETTE,
Vermont Department of Corrections
Commissioner, BENJAMIN WATTS,
Vermont Department of Corrections Health
Services Director, in their official capacities,
and CENTURION OF VERMONT, LLC,

Defendants.

Civil Action No.

**DECLARATION OF LIA ERNST
IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

I, Lia Ernst, declare under penalty of perjury and in accordance with the laws of the United States and of Vermont that:

1. I am one of the attorneys for the Plaintiffs in this matter. I am a member in good standing of the Bar of the State of Vermont and the Bar of this Court.

2. I am also admitted to practice before the courts of the Commonwealths of Pennsylvania (inactive status) and Massachusetts. I received a bachelor of arts degree from Swarthmore College in 1997, a master's degree in anthropology from the University of Wisconsin-Madison in 2004, and my juris doctor, with honors, from the University of Michigan Law School in 2010.

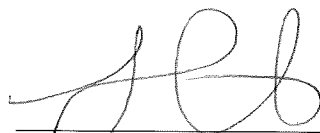
3. I served as a law clerk to the Honorable Julian Abele Cook Jr. of the U.S. District Court for the Eastern District of Michigan in Detroit and to the Honorable Norman H. Stahl of the U.S. Court of Appeals for the First Circuit in Boston. I have also previously served as a legal intern at the ACLU of Michigan, a legal fellow at the ACLU of Massachusetts, and an associate attorney for a small Michigan firm focused on criminal defense and attorney ethics.

4. In 2015, I began my position as a staff attorney for the American Civil Liberties Union of Vermont (ACLU-VT). The ACLU-VT is a non-partisan membership organization that works to defend the individual rights and liberties guaranteed in the United States and Vermont Constitutions through litigation, lobbying, and public education. The ACLU has more than 8,000 members in Vermont and millions of members, activists, and supporters nationwide.

5. As one of two ACLU-VT staff attorneys, I am responsible for all stages of litigation, with or without cooperating attorneys: finding, evaluating, and developing potential cases; communicating with clients/potential clients; researching possible claims and legal strategies; drafting demand letters and records requests; drafting pleadings, motions, and amicus briefs; engaging in discovery; presenting oral argument; and engaging in settlement negotiations. The ACLU-VT's docket is exclusively in the areas of civil rights, civil liberties, and open government.

5. The ACLU-VT has committed resources to this litigation and will continue to do so. We spent time consulting on relevant issues of law with co-counsel and assisting in drafting the Complaint and the Motion for Class Certification. We have already spent many hours on this case and we will continue to devote the time and resources to this case through conclusion.

DATED: May 17, 2019, in Montpelier, Vermont.



Lia Ernst