

Guy B. Wallace – 176151
Mark T. Johnson – 76904
Jennifer U. Bybee – 302212
Travis C. Close – 308673
Rachel L. Steyer – 330064
SCHNEIDER WALLACE
COTTRELL KIM LLP
2000 Powell Street, Suite 1400
Emeryville, California 94608-1863
Telephone: (415) 421-7100
Facsimile: (415) 421-7105
Email: gwallace@schneiderwallace.com
mjohnson@schneiderwallace.com
juhrowczik@schneiderwallace.com
tclose@schneiderwallace.com
rsteyer@schneiderwallace.com

Gay Crosthwait Grunfeld – 121944
Jenny S. Yelin – 273601
Benjamin Bien-Kahn -- 267933
Adrienne Spiegel – 330482
Maya Campbell – 345180
ROSEN BIEN
GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, California 94105-1738
Telephone: (415) 433-6830
Facsimile: (415) 433-7104
Email: ggrunfeld@rbgg.com
jyelin@rbgg.com
bbien-kahn@rbgg.com
aspiegel@rbgg.com
mcampbell@rbgg.com

Kathryn A. Stebner – 121088
Brian S. Umpierre – 236399
STEBNER GERTLER & GUADAGNI
A Professional Law Corporation
870 Market Street, Suite 1285
San Francisco, California 94102-2918
Telephone: (415) 362-9800
Facsimile: (415) 362-9801
Email: kathryn@sgg-lawfirm.com
brian@sgg-lawfirm.com

David T. Marks – *pro hac vice*
MARKS, BALETTE, GIESSEL
& YOUNG, P.L.L.C.
7521 Westview Drive
Houston, Texas 77055
Telephone: (713) 681-3070
Facsimile: (713) 681-2811
Email: davidm@marksfirm.com

Attorneys for Plaintiffs and the Certified Subclasses

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

STACIA STINER; RALPH CARLSON, in his
capacity as Trustee of the Beverly E. Carlson and
Helen V. Carlson Joint Trust; LORESIA
VALLETTE, in her capacity as representative of
the Lawrence Quinlan Trust; MICHELE LYTLE,
in her capacity as Trustee of the Boris Family
Revocable Trust; RALPH SCHMIDT, by and
through his Guardian Ad Litem, HEATHER
FISHER; PATRICIA LINDSTROM, as successor-
in-interest to the Estate of ARTHUR
LINDSTROM; BERNIE JESTRABEK-HART;
and JEANETTE ALGARME; on their own
behalfes and on behalf of others similarly situated,

Plaintiffs,

v.

BROOKDALE SENIOR LIVING, INC.;
BROOKDALE SENIOR LIVING
COMMUNITIES, INC.; and DOES 1 through 100,
Defendants.

Case No. 4:17-cv-03962-HSG (LB)

**DECLARATION OF CLAUDIA
CENTER IN SUPPORT OF
PLAINTIFFS' MOTION FOR
REASONABLE ATTORNEY'S FEES,
COSTS AND EXPENSES**

Judge: Hon. Haywood S. Gilliam, Jr.
Date: October 16, 2025
Time: 2:00 p.m.
Crtrm.: 2, 4th Floor

1 I, Claudia Center, declare:

2 1. I am an attorney duly admitted to practice before this Court. I am the Legal
3 Director at Disability Rights Education and Defense Fund, Inc. (“DREDF”). I have personal
4 knowledge of the facts set forth herein, and if called as a witness, I could and would competently
5 so testify. I make this declaration in support of Plaintiffs’ Motion for Reasonable Attorneys’ Fees,
6 Costs and Expenses.

7 2. I am generally familiar with this class action alleging that Brookdale Senior Living,
8 the largest provider of assisted living for senior citizens and persons with disabilities in the United
9 States, operates its California assisted living facilities in violation of the Americans with
10 Disabilities Act (“ADA”) and the California Unruh Civil Rights Act (“Unruh Act”). I understand
11 that the Court certified four subclasses pursuant to Federal Rule of Civil Procedure 23(b)(2): a
12 class of current and former residents of all of Brookdale’s California facilities who use motorized
13 wheelchairs or scooters, challenging Brookdale’s policy requiring residents to transfer out of their
14 mobility devices to ride on its buses and vans as preventing them from full and equal access and
15 enjoyment of its facilities, in violation of the ADA and the Unruh Act (the “transportation
16 subclass”); and three facility-specific subclasses of current and former residents of Brookdale’s
17 Brookhurst, San Ramon and Scotts Valley assisted living facilities, seeking to make them
18 accessible to people with mobility and vision disabilities by remediating barriers that violate
19 federal and state accessibility requirements (the “access barrier subclasses”). *See* Dkt. Nos. 593
20 (Mar. 30, 2023 Order); 820 (July 22, 2024 Order).

21 3. I understand that, following the Court’s Orders on the parties cross-motions for
22 summary judgment, and shortly before the first of three trials was set to begin, Plaintiffs achieved
23 a proposed class settlement agreement for injunctive relief (the “Proposed Settlement”) that fully
24 resolves the disability claims of the four certified subclasses. The Proposed Settlement requires
25 that Brookdale renovate the indoor and outdoor common areas and a subset of residential units of
26 the Brookhurst, San Ramon and Scotts Valley assisted living facilities to make them compliant
27 with the 2010 Americans with Disabilities Act Standards for Accessible Design (“2010 ADAS”),
28 provide additional modifications to residential units that residents with disabilities at those three

1 facilities require without charging the residents, and maintain a transportation policy that allows
2 residents with disabilities to remain in their mobility devices when they ride on a Brookdale van or
3 bus at all of Brookdale's California assisted living facilities. *See* Dkt. No. 1026-1, Ex. A.

4 4. I also understand that the San Ramon and Scotts Valley subclasses will benefit
5 from individual injunctive relief achieved by the named Plaintiffs in the public parts of the
6 settlement of their individual claims, which is included in the Proposed Stipulated Injunction.
7 Brookdale agreed to significant changes regarding its emergency planning and evacuation
8 procedures at the San Ramon and Scotts Valley assisted living facilities, to more transparency in
9 its communications with current and potential residents on how it determines the appropriate
10 levels of caregiver staffing, and to monitoring and reporting on its caregiver staffing levels at those
11 facilities. *See* Dkt. No. 1026-1, Ex. B.

12 5. I understand that the Court granted Plaintiffs' Unopposed Motion for Preliminary
13 Approval of Class Action Settlement for Injunctive Relief on June 13, 2025, Dkt. No. 1047, and
14 that the final fairness hearing will be held on October 16, 2025, Dkt. No. 1049.

15 **My Background and Professional Experience**

16 6. I graduated from Berkeley Law in December 1991 and joined the California Bar in
17 June 1992. I received a B.A. from Wesleyan University in 1987. I have been the Legal Director
18 of DREDF since February 2020. Prior to this position, I was a Senior Staff Attorney at the
19 American Civil Liberties Union Foundation ("ACLU") Disability Rights Program for six years.
20 Prior to joining the ACLU, I worked at the Legal Aid Society – Employment Law Center (now
21 Legal Aid at Work) for 19 years, where I directed the disability rights program. Before that, I
22 worked as a staff attorney at the National Abortion and Reproductive Rights Action League for
23 two and a half years.

24 7. I have represented plaintiffs in disability rights cases, including complex class
25 actions, for more than 25 years. Representative cases include:

26 a. *Armstrong v. Newsom*, No. 94-cv-02307 CW (N.D. Cal.) (in monitoring),
27 an action challenging the failure to provide people with disabilities incarcerated in California state
28 prisons with accommodations required under the Americans with Disabilities Act ("ADA") and

1 the Rehabilitation Act;

2 b. *Disability Rights Cal. v. Cty. of Alameda*, No. 20-cv-05256-CRB (N.D.
3 Cal.) (in monitoring), an action that challenged Alameda County’s failure to provide adequate
4 mental health services to county residents that resulted in a settlement agreement wherein the
5 County agreed to expand the mental health services that it offers;

6 c. *E.E. v. California*, No. 21-cv-07585-SI, 2021 U.S. Dist. LEXIS 230296
7 (N.D. Cal. Dec. 1, 2021), an action that challenged the design of independent study for students in
8 California based on access barriers faced by special education students, especially those with
9 intellectual and developmental disabilities, and that resulted in a settlement that adopted a
10 framework for resolving the barriers through the legislative process;

11 d. *Student A v. Berkeley Unified Sch. Dist.*, No. 17-cv-02510-JST, 2021 U.S.
12 Dist. LEXIS 250504 (N.D. Cal. Nov. 4, 2021), an action challenging Berkeley Unified School
13 District’s systemic failure to timely identify, evaluate, and provide appropriate interventions and
14 accommodations to students with reading disorders that resulted in a class settlement that required
15 the District to develop and implement a plan to improve reading and language arts achievement
16 for all students, especially those with or at risk for reading disabilities;

17 e. *McCadden v. City of Flint*, No. 18-12377, 2019 U.S. Dist. LEXIS 63244
18 (E.D. Mich. Apr. 12, 2019), an action challenging the unlawful restraint of a seven-year-old child
19 with disabilities by a Flint Police Department School Resource Officer that resolved with a
20 favorable settlement that included policy changes and training;

21 f. *Gray v. Cummings*, 917 F.3d 1 (1st Cir. 2019), an action challenging a
22 police officer’s use of force to detain a patient with a mental health disability who absconded from
23 a hospital after being involuntarily committed;

24 g. *Saucedo v. Gardner*, 335 F. Supp. 3d 202 (D.N.H. 2018), a successful
25 action on behalf of absentee voters, including a blind voter, challenging the signature match
26 requirement under New Hampshire State law wherein the court held that the signature match
27 requirement violated the Due Process Clause of the Fourteenth Amendment and enjoined the
28 provision;

1 h. *Eason v. N.Y. State Bd. of Elections*, No. 16-cv-4292 (KBF), 2017 U.S.
 2 Dist. LEXIS 209249 (S.D.N.Y. Dec. 20, 2017), an action challenging digital access barriers for
 3 blind voters in the online voter registration process in New York that resulted in a settlement
 4 wherein the Board of Elections agreed to make online voter registration forms and related websites
 5 accessible to blind people using screen access software;

6 i. *S.R. v. Kenton Cty. Sheriff's Office*, No. 2:15-cv-143 (WOB-JGW), 2015
 7 U.S. Dist. LEXIS 172043 (E.D. Ky. Dec. 28, 2015), an action challenging a deputy sheriff's
 8 unlawful shackling of two elementary school children that resulted in a favorable agreement with
 9 the U.S. Department of Justice to implement policies to ensure that disciplinary practices do not
 10 discriminate against children with disabilities;

11 j. *Dep't of Fair Emp't & Hous. v. Law Sch. Admission Council, Inc.*, No. C-
 12 12-1830 EMC (N.D. Cal.), an action challenging the Law School Admission Counsel's ("LSAC")
 13 failure to provide adequate accommodations to test takers with disabilities and the LSAC's
 14 practice of flagging score reports of test takers with disabilities who sat for the LSAT with
 15 disability accommodations. The case resolved with a favorable consent decree that
 16 comprehensively improved LSAC's accommodations practices and ended the flagging of score
 17 reports;

18 k. *Ortiz v. Home Depot*, No. 5:09-cv-03485-LHK (N.D. Cal. Feb. 12, 2012), a
 19 class action brought on behalf of deaf employees in California Home Depot stores resulting in a
 20 class settlement that ensured sign language interpreters for class members at particular
 21 communication events, removed barriers to forklift training, and provided monetary relief to each
 22 class member;

23 l. *McMillon v. Hawai'i*, No. CIV. 08-00578 LEK, 2011 WL 6749012 (D.
 24 Haw. Dec. 22, 2011), a class action challenging discriminatory obstacles, hazardous conditions,
 25 and the failure to grant reasonable accommodations in public housing resulting in a class
 26 settlement that included both monetary relief and funding of services to improve conditions for the
 27 class;

28 m. *Goldman v. Standard Insurance Company*, 341 F.3d 1023 (9th Cir. 2003),

1 an action challenging an insurance company's refusal to issue an attorney with a mental health
2 diagnosis a disability income insurance policy; and

3 n. *Nunes v. Wal-Mart Stores*, 164 F.3d 1243 (9th Cir. 1999), an action
4 challenging Wal-Mart's termination of the employment of an employee who experienced syncopal
5 fainting episodes while she was on a medical leave related to her disability.

6 8. I have also served as amicus counsel in dozens of cases of importance to people
7 with disabilities in the state and federal appellate courts including the California Supreme Court
8 and the U.S. Supreme Court. In 2009, I received the Paul G. Hearne Award for Disability Rights
9 from the American Bar Association Commission on Disability Rights. I have served as an adjunct
10 professor of disability rights at University of California Law San Francisco and at Berkeley Law
11 School. I have written articles and given trainings about disability rights on many occasions. A
12 copy of my resume is attached as **Exhibit A**.

13 **My Familiarity with Class Counsel**

14 9. I have long been familiar with Rosen Bien Galvan & Grunfeld LLP ("RBGG") and
15 Schneider Wallace Cottrell Kim LLP ("Schneider Wallace"), co-lead counsel in the instant action.
16 RBGG and Schneider Wallace are both recognized throughout the disability rights law community
17 for their excellent work and impressive results. I have litigated several disability rights cases with
18 RBGG, including *Smith v. California Health and Human Services Agency*, No. 4:21-cv-07872-
19 HSG (N.D. Cal.), *Coleman v. Newsom*, No. 2:90-CV-00520-KJM-SCR (E.D. Cal.), *Hecker v.*
20 *California Department of Corrections and Rehabilitation*, No. 2:05-CV-02441 LKK-DAD (E.D.
21 Cal.), and *Armstrong v. Newsom*, No. 94-cv-02307 CW (N.D. Cal.). I have also litigated several
22 disability rights cases with Schneider Wallace, as well as with Guy Wallace, including *inter alia*,
23 *U.S. Airways, Inc. v. Barnett*, 535 U.S. 391 (2002), *Kramer v. Regents of the University of*
24 *California*, 81 F. Supp. 2d 972 (N.D. Cal. 1999), *Ortiz v. Home Depot U.S.A., Inc.*, No. 5:09-cv-
25 03485-LHK (N.D. Cal.), and *Lopez v. San Francisco Unified School District*, No. C 99-03260 SI
26 (N.D. Cal.). Through these experiences, I know that the attorneys at RBGG and Schneider
27 Wallace possess a high degree of skill and expertise in advocating on behalf of persons with
28 disabilities. Their lawyers have consistently demonstrated to me that they are in the top tier of

1 lawyers with whom I have worked.

2 **Plaintiffs and the Certified Subclasses Obtained an Impressive and Excellent Result**

3 10. I have reviewed the Court's order denying in major part Brookdale's motion to
4 dismiss, and the Court's class certification and summary judgment orders in this case. I am
5 impressed that Plaintiffs prevailed on a number of complex and unresolved legal issues that will
6 help vindicate the rights of additional people with disabilities under the ADA and other civil rights
7 statutes. The outcomes in this litigation go far beyond the rights of the Plaintiffs and the certified
8 subclasses.

9 11. To my knowledge, this case is the first time a Court has held that assisted living
10 facilities are places of public accommodation subject to Title III of ADA where the issue was
11 contested. This holding—reaffirmed by the Court several times—vindicates the rights of the large
12 and growing population of assisted living residents nationwide, most of whom likely qualify as
13 individuals with disabilities under the ADA, to have full and equal access to and enjoyment of the
14 facilities where they live. The applicability of the ADA to assisted living was hotly contested by
15 Defendants throughout this litigation—including in their motion to dismiss, at class certification,
16 and at summary judgment—yet Plaintiffs prevailed on this critical issue at each stage. Confirming
17 that Title III of the ADA applies to assisted living is critically important because Title III provides
18 more fulsome requirements regarding the built environment, including obligations to ensure that
19 new construction and alteration comply with detailed access standards, and to remove barriers
20 where readily achievable. On a practical level, unlike under the Fair Housing Act, Title III
21 requires that the covered entity – and not the resident – pay for any legally required access
22 changes.

23 12. Plaintiffs also obtained an important ruling confirming that subsequent owners of
24 public accommodations are liable under the ADA for violations of federal disability access
25 standards—an issue that has rarely been addressed by the courts, and where there is a split among
26 federal district courts. The Court held that current owners and operators are responsible for
27 compliance with federal disability access standards even if they acquired the public
28 accommodations from other entities that designed and/or constructed the facilities in question.

1 This legal precedent will help individuals with disabilities across the United States to enforce the
2 statutory requirement that all facilities subject to the ADA—not just assisted living—be made
3 readily accessible and usable for individuals with disabilities. Had Defendants prevailed on this
4 question, there would be no remedy to fix access barriers at a facility no longer owned or operated
5 by the entity that designed or constructed it, with the exception of the barrier removal that is
6 “readily achievable.” In other words, the most significant and costly access barriers could not be
7 challenged in court, and many facilities would remain inaccessible for individuals with
8 disabilities, thwarting the purpose of the ADA.

9 13. Plaintiffs who bring disability claims about physical access under federal and state
10 disability rights laws generally must work with a Certified Access Specialist (“CAsp”) expert. A
11 CAsp is a person who has been tested and certified by the state, whom governments, businesses,
12 and litigants can hire to assess accessibility. It is well known within the disability community that
13 CAsp experts who have litigation experience are highly sought after and difficult to obtain. I
14 worked with Gary Waters and Jeffrey Scott Mastin on *Lopez v. San Francisco Unified Sch. Dist.*
15 Based on my personal experience and their reputation within the disability community, it is my
16 opinion that Mr. Waters and Mr. Mastin are both well-regarded, highly qualified CAsp-certified
17 experts. One of the reasons that complex cases seeking injunctive relief under the ADA against
18 public and private entities with multiple facilities are not pursued more often is that the cost of
19 conducting CAsp inspections on the magnitude undertaken in this case is prohibitive to most law
20 firms and nonprofit organizations that practice disability rights law.

21 14. I have reviewed the relief obtained by Plaintiffs in the Proposed Settlement and the
22 Proposed Stipulated Injunction, and I am impressed by both its quality and scope. Plaintiffs
23 secured significant relief for the access barrier subclasses at Brookdale’s Brookhurst, San Ramon
24 and Scotts Valley assisted living facilities. The Proposed Settlement requires remediation of the
25 interior and exterior common area barriers and renovations of multiple resident units at the three
26 facilities to bring them into full compliance the 2010 ADAS, and remediation of additional
27 resident units at the Brookhurst facility. Dkt. No. 1026-1, Ex. A §§ 4.1-4.3. These access
28 improvements will greatly benefit the thousands of residents with mobility and/or vision

1 disabilities who will use these facilities in the future. The Proposed Settlement also requires
2 Brookdale to provide an accessible room to any resident who requests one and to make requested
3 reasonable modifications to a resident's unit in order to accommodate their mobility or vision
4 disability, without requiring them to pay for the renovations or modifications. Dkt. No. 1026-1,
5 Ex. A § 4.4. In my 30 years experience practicing disability rights law, this is the first case I have
6 learned about where a network of assisted living facilities stipulated to an injunction requiring it to
7 renovate assisted living facilities to bring them into compliance with federal disability access
8 requirements, and to provide accessible rooms and/or reasonable modifications to any resident
9 with a disability who requests them, free of charge. Obtaining this relief at Brookdale's San
10 Ramon and Scotts Valley facilities is a particularly excellent result, given that these two facilities
11 were built prior to the effective date of Title III of the ADA.

12 15. Monitoring is an exceptionally important component of a remedial plan to ensure
13 that the relief promised on paper is actually realized, and the monitoring provisions in the
14 Proposed Settlement are robust. They provide for reasonable time frames for Defendants to
15 prepare designs and plans of the access work and to complete readily achievable barrier removal,
16 and the appointment of a neutral certified/licensed architect with a CASp certification to oversee
17 the work. There is also a process for Class Counsel to review and object to the plans and designs,
18 and to inspect the completed work with the neutral CASp architect, who may require revisions to
19 ensure the renovations meet the requirements of the Proposed Settlement. Dkt. No. 1026-1, Ex. A
20 §§ 4.6-4.10. The Proposed Settlement also anticipates and provides for relief in the event that
21 Defendants cease owning, operating, or managing the assisted living facilities prior to the
22 completion of the access remediation. Dkt. No. 1026-1, Ex. A §§ 4.13-4.16.

23 16. Plaintiffs also secured significant relief for the transportation subclass of residents
24 at all of Brookdale's California assisted living facilities. Plaintiffs achieved a permanent change
25 to Brookdale's Fleet Safety Policy, which improperly required residents who use motorized
26 wheelchairs and scooters to transfer out of their mobility devices in order to use Brookdale's
27 transportation services, in violation of the ADA and its implementing regulations. It is my
28 understanding that Brookdale changed the policy to remove the unlawful mandatory transfer

1 requirement after the Court certified the transportation subclass. The prior policy was unsafe for
2 residents with disabilities, who are at high risk of acuity and even death from falls. The Proposed
3 Settlement requires that the new transportation policy will remain in effect, and that Brookdale
4 will continue to allow residents to remain in their wheelchairs or scooters while being transported
5 on a Brookdale vehicle. Dkt. No. 1026-1, Ex. A § 5.1. Ensuring that Brookdale cannot revert to
6 its prior illegal policy is important and will ensure California residents who use wheelchairs or
7 scooters have full and equal access to Brookdale's vans and buses and protect them from the
8 safety risks of unnecessary transfers, including pressure sores and the risk of falling. The remedy
9 also sends a message to other assisted living facilities to avoid or cease using such unsafe and
10 unfair policies.

11 17. Plaintiffs also obtained important injunctive relief for the named plaintiffs in the
12 public parts of the settlement of their individual claims that will benefit the members of the San
13 Ramon and Scotts Valley access barrier subclasses (the two facilities where named plaintiffs still
14 reside). The Proposed Stipulated Injunction provides for significant improvements to these
15 facilities' emergency evacuation plans for that benefit all current and future residents with
16 mobility and/or vision disabilities. These improvements include the use of accessible assembly
17 areas, the use of vehicles during evacuations that are able to transport residents' mobility devices
18 to relocation sites, and the opportunity for residents with disabilities to participate in emergency
19 evacuation drills. Dkt. No. 1026-1, Ex. B § 19. This is an excellent result, especially given the
20 dearth of caselaw recognizing that individuals with disabilities have viable claims under Title III
21 of the ADA for full and equal access to emergency evacuation services from places of public
22 accommodation. These changes will improve Brookdale's ability to safely evacuate San Ramon
23 and Scotts Valley residents with disabilities during emergencies, which is particularly critical
24 given the increasing number of devastating wildfires and flooding in California.

25 18. Plaintiffs also obtained injunctive relief on their individual claims regarding
26 caregiver staffing levels and disclosures regarding staffing that will benefit the members of the
27 San Ramon and Scotts Valley access barrier subclasses. The Proposed Stipulated Injunction
28 requires Brookdale's California Residency Agreement to clearly disclose that they do not make

1 any representations or warranties regarding the caregiver staffing levels, and to instruct facility
2 level staff to refrain from making any representations to the contrary to current or prospective
3 residents of the San Ramon and Scotts Valley facilities. Dkt. No. 1026-1, Ex. B §§ 20-21. This
4 provides important notice to prospective residents that will allow them to make an informed
5 decision as to whether to move into one of Brookdale's assisted living facilities. The Proposed
6 Stipulated Injunction also requires Defendants to apply a reasonable determination of the caregiver
7 staffing levels required to provide promised care services to residents at Brookdale's San Ramon
8 and Scotts Valley facilities, and to monitor and report to Plaintiffs' counsel on whether actual
9 staffing provided at these facilities was below Brookdale's staffing benchmarks on a semi-annual
10 basis for a two-year period. Dkt. No. 1026-1, Ex. B §§ 22-23. Taken together, these requirements
11 increase the likelihood that residents will receive promised care services. This relief provides a
12 disproportionate benefit to residents with disabilities, who are more likely to require more
13 substantial assistance with their activities of daily living from caregiver staff.

14 19. In my view, the quality of the relief that Plaintiffs have obtained in this case is
15 comparable to, if not greater than, other settlements secured in actions brought under the ADA.
16 As discussed above, the Proposed Settlement and Proposed Stipulated Injunction contain detailed
17 and concrete provisions that reflect a high level of attention and care, built on thorough factual
18 development over years of litigation. The settlement provides extraordinary and comprehensive
19 relief to the members of the certified subclasses, and will meaningfully improve their lives while
20 they reside in Brookdale's assisted living facilities. It will also improve the lives of countless
21 future residents of these facilities. Further, the settlement provides new standards and guidance
22 that will benefit residents of assisted living facilities at sites across the country.

23 I declare under penalty of perjury under the laws of the United States of America that the
24 foregoing is true and correct to the best of my knowledge, and that this declaration is executed at
25 Berkeley, California this 5th day of August, 2025.

26
27 

28 Claudia Center

Exhibit A

Claudia Center

EDUCATION

Berkeley Law, University of California at Berkeley, J.D. 1991
Wesleyan University, B.A. 1987

EMPLOYMENT

Disability Rights Education and Defense Fund, February 2020 to the present

Legal Director. Lead DREDF legal department response to emerging issues such as Supreme Court rulings and COVID-19 pandemic. Litigate and supervise litigation of cases. Draft and supervise drafting of amicus briefs, policy documents, and comments on legislative and agency materials.

National ACLU Foundation, Disability Rights Program, April 2014 to February 2020

Senior Staff Attorney. Worked to implement disability rights agenda into core ACLU issue areas, including voting, criminal justice reform, community and family life, reproductive freedom, and education. Advised affiliate counsel on matters of disability rights. Litigated cases. Drafted amicus briefs and comments on legislation and agency materials.

Legal Aid Society – Employment Law Center, San Francisco, March 1995 to April 2014

Senior Staff Attorney. Directed disability rights program. Supervised and conducted employment and disability rights litigation in state and federal courts. Drafted amicus briefs. Directed weekly Workers' Rights Disability Law Clinic for low-wage employees and job seekers with disabilities. Drafted policy statements on emerging issues and comments on proposed legislation and agency materials. Led successful coalition to enact comprehensive amendments to the FEHA to broaden protections for persons with disabilities in employment and housing. Worked with coalition to enact the ADA Amendments Act.

National Abortion & Reproductive Rights Action League, D.C., September 1992 to March 1995

Staff Attorney. Drafted legislation, amicus briefs, policy reports, factsheets and testimony regarding access to abortion and other reproductive health services. Provided legal support to state affiliate organizations.

Women's Law & Public Policy Fellowship Program, D.C., September 1992 to September 1993

Fellow. Participant in legal and public policy program devoted to the advancement of women's rights. Based at the Georgetown University Law Center.

ADDITIONAL EXPERIENCE

Consultant and Trainer, Mobility International USA, May 2017 to June 2018.

Guadalajara, Mexico (January and June 2018)

Islamabad, Pakistan (September 2017)

Guatemala City, Guatemala (May 2017)

Board Member, Board Chair Disability Rights Education and Defense Fund, 2007 to 2020.

Adjunct Professor, Disability Rights Law, Berkeley Law and Hastings College of the Law.

AWARDS

Paul G. Hearne Award for Disability Rights, ABA Commission on Mental and Physical Disability Law, 2009.

Certificate of Merit, Bar Association of San Francisco, 1998.

SELECTED CASES

Barnett v. U.S. Air, 228 F.3d 1105 (9th Cir. 2000) (amicus counsel)
Bates v. U.P.S., 511 F.3d 974 (9th Cir. 2007) (amicus counsel)
California Advocates for Nursing Home Reform v. Chapman, No. A147987 (Cal. App. filed Sept. 29, 2017) (amicus counsel)
City & Cty. of San Francisco, Calif. v. Sheehan, 135 S. Ct. 1765 (2015) (amicus counsel)
Colmenares v. Braemer Country Club, Inc., 29 Cal.4th 1019 (2003) (amicus counsel)
CVS Pharmacy, Inc. v. Doe, 142 S. Ct. 480 (2021) (amicus counsel)
Fusco v. American Airlines, 400 F.3d 702 (9th Cir. 2005) (amicus counsel)
Gambini v. Total Renal Care, Inc., 480 F.3d 950 (9th Cir. 2007) (amicus counsel)
Goldman v. Standard Insurance Company, 341 F.3d 1023 (9th Cir. 2003) (party counsel)
Green v. State, 42 Cal.4th 254 (2007) (amicus counsel)
Hogya v. U.P.S., 424 F.3d 1060 (9th Cir. 2005) (amicus counsel)
Hwang v. Kansas State Univ., 753 F.3d 1159 (10th Cir. 2014) (amicus counsel)
Lopez v. Pacific Maritime Assoc., 657 F.3d 762 (9th Cir. 2011) (amicus counsel)
Marks v. Colorado Dep't of Corrections, No. 19-1114 (10th Cir.) (amicus counsel)
Nunes v. Wal-Mart Stores, 164 F.3d 1243 (9th Cir. 1999) (party counsel)
Raytheon Company v. Hernandez, 540 U.S. 44 (2003) (amicus counsel)
Reyazuddin v. Montgomery County, Maryland, 789 F.3d 407 (4th Cir. 2015) (amicus counsel)
Roby v. McKesson, 57 Cal.Rptr.3d 541 (Cal. 2007) (amicus counsel)
Smith v. Cal. Dep't of Managed Health Care, No. 21-cv-07872-HSG, 2023 U.S. Dist. LEXIS 209492 (N.D. Cal. Nov. 22, 2023) (party counsel)
Sutton v. United Airlines, 527 U.S. 471 (1999) (amicus counsel)
Tennessee v. Lane, 541 U.S. 509 (2004) (amicus counsel)
U.S. Airways v. Barnett, 535 U.S. 391 (2002) (party counsel)
Wills v. Orange Cty, 195 Cal.App.4th 143 (2011) (amicus counsel)

SELECTED WRITINGS

Comments of ACLU in opposition to the U.S. Department of Homeland Security proposed regulations entitled “Inadmissibility on Public Charge Grounds” (Dec. 10, 2018)
 Comments of ACLU to the U.S. Commission on Civil Rights, on behalf of organizations advocating for incarcerated and formerly incarcerated individuals with disabilities (July 19, 2017).
 “Leaves of Absence as a Reasonable Accommodation for Workers with Disabilities,” testimony before the Equal Employment Opportunity Commission, June 8, 2011.
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