

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45  
46  
47  
48  
49  
50  
51

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MARKELETTA WILSON, MARIE  
TOWNES, and all other similarly situated  
individuals,

Plaintiffs,

vs.

SEATTLE HOUSING AUTHORITY, and  
THOMAS TIERNEY, Executive Director of  
the Seattle Housing Authority, in his Official  
Capacity,

Defendants.

CLASS ACTION

No. 09-CV-00226-MJP

DECLARATION OF CLASS  
REPRESENTATIVE, MARKELETTA  
WILSON, IN SUPPORT OF PLAINTIFFS’  
MOTION FOR ATTORNEYS’ FEES,  
COSTS, AND INCENTIVE PAYMENTS

I, Markeletta Wilson, declare under penalty of perjury under the laws of the United States  
that the following is true and correct:

1. I am 54 years old and one of the Class Representatives representing the Class  
Members in this action.
2. I receive \$664 per month from the Supplemental Security Income program. That  
is my only source of income.
3. I contacted Solid Ground in the summer and fall of 2008 to find assistance with  
my housing problems including issues with the Seattle Housing Authority (“SHA”). Solid  
Ground referred me to Columbia Legal Services (“CLS”) for legal assistance.

DECLARATION OF MARKELETTA  
WILSON (No. 2:09-CV-00226-MJP) – 1

- 1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45  
46  
47  
48  
49  
50  
51
4. I met with CLS in October 2008 to discuss my case.
  5. I agreed to become a Class Representative in February 2009.
  6. Since that time, I have dedicated about 150 hours to serving as a Class

Representative. Among other things, I have:

- a. Helped Class Counsel prepare the original Complaint and three Amended Complaints and provided additional direction and information about the issues in the case.
- b. Reviewed the briefing in this case, including papers filed by Class Counsel, SHA, and the U.S. Department of Housing and Urban Development (“HUD”).
- c. Prepared for and provided deposition testimony. My deposition lasted approximately four hours.
- d. Responded to written discovery, including interrogatories from HUD and interrogatories and requests for admissions from SHA.
- e. Helped prepare and provided declarations in support of a motion for preliminary injunction, a motion for class certification, a motion for summary judgment and an opposition to HUD’s motion for summary judgment.
- f. Attended court hearings, including the hearing on May 10, 2010.

7. I also attended the first day of mediation, which lasted approximately 14 hours. I actively participated in all aspects of settlement negotiations during that time and monitored Class Counsel to ensure that they were seeking an agreement that best served the interests of the Class. Although I did not attend the second day of mediation, I did consult with Class Counsel via telephone over the course of that day.

8. Representing the Class was particularly difficult for me because I suffer from severe Anxiety Disorder and Major Depressive Disorder. I have been suffering from those conditions since I was a young girl. They prevent me from working and often make it difficult to

1 engage in major life activities like thinking, sleeping, cleaning, and caring for myself. At times,  
2 I have difficulty remembering things, following through on tasks, and recalling my address and  
3 telephone number. I also struggle with diabetes, high blood pressure, stroke-related issues, and  
4 knee problems. Those physical problems make it difficult for me to climb stairs and walk long  
5 distances. There are times when I cannot leave my home due to my mental and physical  
6 disabilities. I receive therapy in my home due to my inability to access outside treatment  
7 options.  
8  
9  
10  
11  
12  
13  
14

15 Dated this 8th day of November, 2011 in Seattle, Washington.  
16  
17  
18

19 By: Markeletta Wilson  
20  
21

22 Markeletta Wilson  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45  
46  
47  
48  
49  
50  
51

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45  
46  
47  
48  
49  
50  
51

**CERTIFICATE OF SERVICE**

I hereby certify that on the \_\_\_ day of November, 2011, I electronically filed the foregoing Declaration of Class Representative, Markeletta Wilson, in Support of Plaintiffs' Motion for Attorneys' Fees, Costs, and Incentive Payments with the Clerk of the Court using the CM/ECF system, which will send notice to counsel as follows:

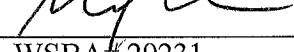
Kristen Dorrity, WSBA #23674  
Laura Hawes Young, WSBA #39346  
**Andrews Skinner, P.S.**  
645 Elliott Avenue West, Suite 350  
Seattle, WA 98119-3911  
Telephone: 206.223.9248  
Facsimile: 206.623.9050  
Email: kristen.dorrity@andrews-skinner.com  
laura.young@andrews-skinner.com

James Ernest Fearn, Jr., WSBA #2959  
**Seattle Housing Authority**  
120 Sixth Avenue North  
P.O. Box 19028  
Seattle, WA 98109  
Telephone: 206.615.3572  
Facsimile: 206.615.3509  
Email: jfearn@seattlehousing.org

**Counsel for Defendants Seattle Housing Authority and Thomas Tierney**

I CERTIFY UNDER PENALTY OF PERJURY under the laws of the United States that the foregoing is true and correct.

DATED at Seattle, Washington this 9<sup>th</sup> day of November, 2011.

s/ Merf Ehman   
MERF EHMAN, WSBA# 29231  
NICHOLAS B. STRALEY, WSBA# 25963  
COLUMBIA LEGAL SERVICES  
101 Yesler Way, Ste 300  
Seattle, WA 98104  
Phone: 206-464-5933  
Fax: 206-382-3386  
Email: [merf.ehman@columbialegal.org](mailto:merf.ehman@columbialegal.org)  
Attorneys for Plaintiffs