

**EXHIBIT "11"**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
NORTHEASTERN DIVISION

HISPANIC INTEREST COALITION )  
OF ALABAMA; et al., )

Plaintiffs, )

v. )

CASE NO. 5:11-CV-2484-SLB )

ROBERT BENTLEY, in his official )  
capacity as Governor of the State of )  
Alabama; et al., )

Defendants. )

RT. REV. HENRY N. PARSLEY, JR., in )  
his official capacity as Bishop of the )  
Episcopal Church in the Diocese of )  
Alabama, et al., )

Plaintiffs, )

v. )

Case Number: 5:11-CV-2736-CLS )

ROBERT BENTLEY, in his official )  
capacity as Governor of the State of )  
Alabama; et al., )

Defendants. )

UNITED STATES OF AMERICA, )

Plaintiff, )

v. )

Case Number: 2:11-CV-2746-LSC )

STATE OF ALABAMA; )  
GOVERNOR ROBERT J. BENTLEY, )

Defendants. )

**DECLARATION UNDER PENALTY OF PERJURY OF MATT ENNIS**

I, Matt Ennis, hereby declare under penalty of perjury that the matters contained in this declaration are true and accurate to the best of my knowledge and belief.

1. I am over the age of 19 years and otherwise competent to testify under oath. Unless otherwise indicated, I have personal knowledge of the matters contained in this statement.

2. I am the director of development for Cahaba Valley Health Care, a nonprofit organization that partners with Episcopal, Methodist, Roman Catholic and other churches, to provide healthcare to Birmingham area residents in need; no questions asked.

3. We are based in central Alabama and dedicated to providing access to quality healthcare for the underserved, primarily Hispanic, communities in Jefferson and Shelby counties.

4. As well as the faith community in Birmingham, we partner with, among others, the University of Alabama School of Optometry, UAB School of Dentistry, John Sasser Opticians, Callahan Eye Foundation Hospital, SightSavers of Alabama, Birmingham District Dental Society, the National Dental Association, Birmingham Health Care and Cooper Green Mercy Hospital.

5. We rely on the support of local Birmingham area churches to be able to provide our screening services. Many in the Hispanic Community, specifically those who are undocumented, find it difficult to trust the medical establishment. The Hispanic

Community trusts us primarily because their churches trust us and they trust their churches.

6. We primarily screen for dental and eye problems. We conduct those screenings at local churches. If an individual is in need of dental or eye services, we provide those at our offices in Birmingham or at UAB. We treat approximately 600 people a year and about half are Hispanic. I have reason to suspect that many of the individuals who receive dental and eye services from us are undocumented.

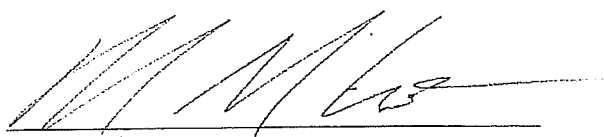
7. We do not verify anyone's documents before providing services, nor do we intend to do so in the future. All you need to participate in our program is proof of residency, which can be a utility bill or a lease.

8. Already both potential patients and volunteers are reluctant to take part in the program because they will be subject to prosecution under the Law. Even if people are legally documented, they say they are afraid to come to a health screening because they do not want to have to disclose information on others who they know are undocumented.

9. Because of the Law, residents will not receive the healthcare they need due to being subjected to being arrested. What will result is that easily treatable health issues will turn into major problems.

10. All of our dentists and eye doctors are volunteers as well as the church members that also provide assistance. Although we all face criminal prosecution for continuing to serve undocumented residents, we do not have any plans to stop.

I declare the foregoing is true and accurate to the best of my knowledge and belief. Further declarant sayeth not.



Matt Ennis

8/17/11

Date