

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

STEPHANIE BIEDIGER, KAYLA LAWLER  
ERIN OVERDEVEST, KRISTEN  
CORINALDESI, and LOGAN RIKER,  
individually and on behalf of all  
those similarly situated;  
and  
ROBIN LAMOTT SPARKS, individually,

Case No. 3:09-CV-621(SRU)

Plaintiffs,

v.

QUINNIPIAC UNIVERSITY,

Defendant.

February 1, 2010

DECLARATION OF KRISTEN GALLES IN SUPPORT OF  
MOTION FOR CLASS CERTIFICATION

I, KRISTEN GALLES, state and declare as follows:

1. I am over the age of 18 and am competent to testify about the matters set forth herein.

2. I am one of the attorneys for the plaintiffs in the above-captioned action. I submit this declaration to demonstrate my adequacy to serve as class counsel under Fed. R. Civ. P. 23(a)(4).

3. I was admitted pro hac vice to serve as co-counsel with the ACLU and the law firm of Pullman & Comley in this case. I am admitted to practice in the District of Columbia, the Commonwealth of Virginia, and the states of California and Nebraska. I am a member of several U.S. District Courts and U.S. Courts of Appeals, including the U.S. Court of Appeals for the Second Circuit. I am also admitted to practice before the United States Supreme Court.

4. I have been a litigator for about 20 years, including several years as a large firm attorney involved in complex litigation matters in San Francisco and

Washington, D.C. I began working on Title IX litigation matters as a pro bono project with the National Women's Law Center in 1993 when I filed several Title IX athletic participation and benefits cases throughout the state of Nebraska. I began my own legal practice focusing on Title IX litigation in 1996.

5. I have served as lead and/or advisory counsel on over 20 Title IX class action cases on behalf of female athletes. I am experienced in representing such classes. I recently completed a more than 10-year Title IX litigation on behalf of high school female athletes in the state of Michigan against the Michigan High School Athletic Association. Plaintiffs obtained substantial injunctive relief involving the addition of new sports, athletic season changes, facilities changes and upgrades, and enhanced publicity for girls' sports.

6. I frequently speak and teach classes and continuing legal education classes on Title IX and gender equity law and litigation. I have lectured to legal groups, sports groups, educators, academics, parents, students, and the NCAA on Title IX and gender equity.

7. I was co-chair of the American Bar Association Individual Rights Section's committee on the rights of women for many years until I moved to the Section Council last year. In that capacity I wrote the ABA's Legal Comments on the 2003 U.S. Department of Education's Commission on Equal Opportunity in Athletics (commonly known as the Title IX Commission), co-wrote the ABA's U.S. Supreme Court amicus briefs in *Jackson v. Birmingham, Alabama Bd. of Ed.*, 544 S. Ct. 167 (2005) (Title IX retaliation) and *Fitzgerald v. Barnstable*, \_\_\_ U.S. \_\_\_ (2009), and organized and presented several ABA CLE programs on Title IX. Thus, I am familiar with the substantive law involved in this action.

8. I previously served as class counsel in two Title IX cases against high school districts in this Court in the late 1990s. Both led to favorable settlements with substantial injunctive relief.

I declare under penalty of perjury that the foregoing facts are true and correct to the best of my knowledge and recollection.

Executed this 1st day of February, 2010, in Alexandria, VA

By:   
Kristen Galles

CERTIFICATION of SERVICE

I hereby certify that on the date hereon, a copy of the foregoing *DECLARATION OF KRISTEN GALLES IN SUPPORT OF MOTION FOR CLASS CERTIFICATION* was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Alex V. Hernandez  
Alex V. Hernandez (ct08345)

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