

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

STEPHANIE BIEDIGER, KAYLA LAWLER	)	
ERIN OVERDEVEST, KRISTEN	)	
CORINALDESI, and LOGAN RIKER,	)	Case No. 3:09-CV-621(SRU)
individually and on behalf of all	)	
those similarly situated;	)	
and	)	
ROBIN LAMOTT SPARKS, individually,	)	
	)	
Plaintiffs,	)	
v.	)	
	)	
QUINNIPIAC UNIVERSITY,	)	
	)	
Defendant.	)	February 1, 2010

**DECLARATION OF JONATHAN B. ORLEANS IN SUPPORT OF  
MOTION FOR CLASS CERTIFICATION**

I, JONATHAN B. ORLEANS, 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 have been admitted to the bar of this Court since 1985. I am also admitted to practice in the states of Connecticut and New York, the U.S. District Court for the Southern District of New York, the U.S. Court of Appeals for the Second Circuit, and the United States Supreme Court.
4. I graduated from NYU School of Law in 1984. After my clerkship with the Honorable M. Joseph Blumenfeld, then a Senior Judge of this Court, I joined the law firm of Zeldes, Needle & Cooper, PC, where I practiced as a litigator in state and federal courts for over 20 years. In 2008 I joined my current firm, Pullman & Comley, LLC, where I have continued

my litigation practice. I am currently a member of the Executive Committee of the Connecticut Bar Association's Federal Practice Section.

5. I have been a cooperating attorney with the American Civil Liberties Union of Connecticut (on whose Board of Directors I currently serve) for many years, and have represented plaintiffs in several antidiscrimination cases in this Court, including *Stewart B. McKinney Foundation v. Town of Fairfield*, 790 F.Supp. 1197 (D.Conn. 1992) and *Tsombanidis v. West Haven*, 180 F.Supp.2d 262 (D.Conn. 2001), *reversed in part* 352 F.3d 565 (2d Cir. 2003), both of which were brought under the Fair Housing Act challenging discrimination against people with disabilities. The instant litigation is my first Title IX case.

6. I have represented defendants in several class action cases in the federal courts. The instant litigation is my first experience representing class plaintiffs. However, my co-counsel in this matter, Attorney Kristen Galles, is experienced in representing class plaintiffs in Title IX actions.

7. With Attorney Galles, my partner Alex Hernandez, and Attorney David McGuire of the ACLU Foundation of Connecticut, I represented the plaintiffs herein in obtaining the preliminary injunction entered by the Court in this action.

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 Bridgeport, CT.

By:           /s/ Jonathan B. Orleans            
Jonathan B. Orleans

CERTIFICATION of SERVICE

I hereby certify that on the date hereon, a copy of the foregoing *DECLARATION OF JONATHAN B. ORLEANS 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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