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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

THERESA RIFFEY, et al.,

Plaintiffs,

v.

No.: 10-cv-02477

Judge: Honorable Manish S. Shah

GOVERNOR BRUCE RAUNER, in his official capacity as Governor of the State of Illinois; and SEIU HEALTHCARE ILLINOIS & INDIANA,

Defendants.

DECLARATION OF MILLARD STEPP

Millard Stepp hereby declares as follows:

- 1. I am a home care worker in the State of Illinois' Home Services Program. I am 58 years old and live in Chicago, Illinois.
- 2. I have been working in the Home Services Program since about 2004. I have provided care for the same client since I began working in the Home Services Program. The types of care I provide range from assisting with toileting, cleaning, laundry, cooking, medication reminders, to accompanying my client to doctors' appointments.
- 3. When I began working in the Home Services Program, the State automatically deducted fair-share fees from my wages to support my union representative, SEIU Healthcare Illinois & Indiana ("Union"). I had no objection to providing financial support for the Union. I believe that a strong union representative is necessary if home care workers are to be treated with the dignity and respect that we deserve. I believe that a workforce of this size needs a strong

Union to stay informed and organized. I believe that all home care workers should pay their fair share to support the Union because all home care workers benefit from the Union's activities.

- 4. Our current Union contract provides for pay of \$13/hour for home care workers, a significant increase from what I was paid when I first started. Our contract also provides for the State to pay into a health benefits fund and for training. I have found the training classes to be very useful and have taken many of them, and plan to take them again in the near future. I believe these classes have made me a better caregiver.
- 5. I do not believe that home care workers would have achieved this without a strong Union or that we will be able to continue to improve the status of home care workers without a strong Union. I believe that the Union is necessary to keep home care workers informed of policies that affect us and our clients. I believe that without the Union, I would not be as informed of important policies, nor as involved the political process.
- 6. When I first started working in the Home Services Program I was not familiar with everything our Union does and with the importance of becoming a Union member. After I received literature in the mail and learned more about the Union, I decided to join the Union as a member in about September of 2009. I have remained a Union member ever since.
- 7. I do not support the Harris v. Quinn lawsuit or the goal of the National Right to Work Legal Defense Fund to weaken our Union. I do not believe the named plaintiffs represent me or my views. When I first heard about this lawsuit, I could not believe it. I do not understand and cannot relate to the named plaintiffs and their views on the Union and the fair-share fees. I believe that the fair-share fees I paid to the Union were well-worth it, and contributed to the Union's fight for wage increases and training for all home care workers.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 17 day of Ext 2015.

Willand A Stepp

Millard Stepp