

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

<p>TWANDA MARSHINDA BROWN; SASHA MONIQUE DARBY; CAYESHIA CASHEL JOHNSON; AMY MARIE PALACIOS; NORA ANN CORDER; and XAVIER LARRY GOODWIN and RAYMOND WRIGHT, JR., on behalf of themselves and all others similarly situated;</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>LEXINGTON COUNTY, SOUTH CAROLINA; GARY REINHART, in his individual capacity; REBECCA ADAMS, in her official and individual capacities as the Chief Judge for Administrative Purposes of the Summary Courts in Lexington County and in her official capacity as the Judge of the Irmo Magistrate Court; ALBERT JOHN DOOLEY, III, in his official capacity as the Associate Chief Judge for Administrative Purposes of the Summary Courts in Lexington County; BRYAN KOON, in his official capacity as the Lexington County Sheriff; and ROBERT MADSEN, in his official capacity as the Circuit Public Defender for the Eleventh Judicial Circuit of South Carolina,</p> <p style="text-align: center;">Defendants.</p>	<p style="text-align: center;">Case No. 3:17-cv-01426-MBS-SVH</p>
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**DECLARATION OF SUSAN K. DUNN IN SUPPORT OF
PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

I, Susan K. Dunn, declare as follows:

1. I am the Legal Director of the ACLU of South Carolina ("ACLU-SC") and co-counsel for Plaintiffs in this case. I am a member in good standing of the bar of the State of

South Carolina. I respectfully submit this declaration in support of Plaintiffs' Motion for Class Certification. Except as otherwise noted, I have personal knowledge of the facts set forth in this declaration and could testify competently to them if called to do so.

2. The ACLU-SC is a state-wide, non-profit legal organization based in Charleston, South Carolina. The ACLU-SC has experience in complex civil litigation, including class actions in federal and state courts. The ACLU-SC also has significant experience in class actions seeking injunctive relief for individuals whose constitutional rights have been infringed.

3. Prior to joining the ACLU-SC in January 2009, I worked in private practice in Charleston for more than 30 years. For 12 years, beginning in the mid-1990's, I litigated a high-profile and groundbreaking constitutional case challenging a policy mandating the testing of pregnant and postpartum women at a public hospital for cocaine use, and the delivery of those test results to law enforcement. My clients ultimately won a favorable ruling in the United States Supreme Court that led to a settlement of the case.


4. In 1998, I was awarded the Jean Galloway Bissell Award, which is presented annually by the South Carolina Women Lawyers Association to a person who has contributed to the advancement of women in the practice of law in South Carolina.

5. I received my undergraduate degree from Duke University and my J.D. from the University of North Carolina-Chapel Hill.

6. The ACLU-SC will zealously represent Plaintiff Xavier Larry Goodwin and Plaintiff Raymond Wright, Jr. and the proposed Class members in this case and has the resources

to do so.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed in Charleston, South Carolina on this 20th day of July, 2017.

By: 

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