

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

THERESA RIFFEY, et al.,

Plaintiffs,

v.

No.: 10-cv-02477

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

Judge: Honorable Manish S. Shah

Defendants.

DECLARATION OF ROSEMARY DAVIS-GREENE

Rosemary Davis-Greene hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 65 years old and live in Chicago, Illinois.
2. I have been working in the Home Services Program since about 2006. I provide care for my daughter, and have cared for her even before I started with the Home Services Program. I assist her with medicine reminders, cleaning, accompanying her to medical appointments. I also prepare her meals, assist her with laundry, and go grocery shopping for her, and sometimes assist with bathing and dressing.
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 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 big increase from when I first started in the Home Services Program. Our contract also provides for the State to pay into a health benefits fund and for training. 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.

5. I believe the training is very useful. I always learn something new, even if I attend the same class more than once. I really appreciate the classes because they give me the chance to learn from the experiences of other home care workers. I believe the classes help home care workers develop professionally, and that I've become a better home care worker since attending the classes.

6. The Union has given me the opportunity to go to Springfield to rally in support of funding for home care programs, which not only supports me, but also supports my daughter. With the Union, many home care workers can come together have a more powerful voice. I would not have been as involved or informed without the Union. I am not as involved as I would like to be, but I believe that the Union is a strong advocate for home care workers and consumers, and I believe they fight for me even when I cannot participate.

7. 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 learned more about the Union through their mailings, I decided to join the Union as a member in about May of 2011 and have remained a Union member ever since.

8. 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 understand why people would want to reap the benefits of the Union contract, but not want to contribute. I do not understand why the named plaintiffs would not want to support the very Union that supports home care workers. I do not believe it is fair. The named plaintiffs do not speak for me and they do not represent me.

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

Executed this 21 day of Sept. 2015.

A handwritten signature in cursive script that reads "Rosemary Davis-Greene". The signature is written in black ink and is positioned above a horizontal line.

Rosemary Davis-Greene