

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

THERESA RIFFEY, et al.,

Plaintiffs,

No.: 10-cv-02477

v.

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 EULAR SHERROD

Eular Sherrod hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 66 years old and live in Chicago, Illinois.
2. I have been working in the Home Services Program since about 2007. I have provided care for my son during that entire time. My son has a brain injury; he requires constant care.
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 work.

4. When I first started working in 2007 my hourly rate of pay was about \$9.25. Since then I have seen my wage rate increase to \$13/hour and 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. Without a Union it would be extremely hard for us to make any improvements. Like other home care workers, I don't have anyone else to speak for me. I felt that I needed a representative with the State. This is the reason I became a member. Before becoming a home care worker, I worked in the insurance industry for 20 years. I did not have a union to represent me there and felt like I was on my own whenever I had a problem.

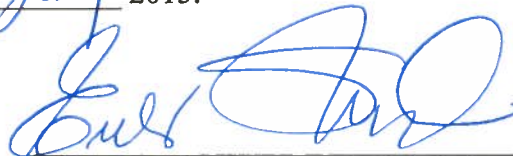
5. When I first started working in the Home Services Program I was not familiar with everything our Union does and with the importance of becoming a Union member. As a result, at some point in 2009, I called the Union to get more information. A representative of the Union came to my home to talk with me and I signed up as member right then. I wanted to be a member because the State kept cutting the hours my son could receive. I felt that I needed someone to help me in my interaction with State. Since then I have remained a proud Union member and have occasionally worked to recruit other members. I have felt very satisfied that the Union supports me and has my interest in mind. I have also been very pleased with the training classes I have been able to take; they have benefitted me and improved the quality of care I provide to my son.

6. 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 feel that the Plaintiffs represent my interests or the interests of any home care workers in Illinois. I don't believe the Union should have to

pay return fees to anyone; I do not want the fees I paid returned to me. I feel that the Union used the money I paid to benefit me and I am grateful for that.

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

Executed this 30th day of July 2015.



Eular Sherrod