

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 EARLINE TAYLOR

Earline Taylor hereby declares as follows:

1. I am a home care worker in the State of Illinois' Home Services Program. I am 52 years old and live in Evergreen Park, Illinois.
2. I have been working in the Home Services Program since about 2013. I have provided care for the same client since I began in the Program. The types of care I provide range from helping my client with bathing, toileting, preparing meals, cleaning and medication, to assisting with her physical therapy and personal finances.
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 understood what the fee was and what it went toward. I had no objection to providing financial support for the Union and have none now.
4. I have not become a member of the Union through the Home Services Program. I was a member of the Union when I worked for a private home care agency, but I stopped

working for that agency in 2010. I have not been a member again since. This is not because I oppose the Union, rather, I simply keep forgetting to sign up. 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.

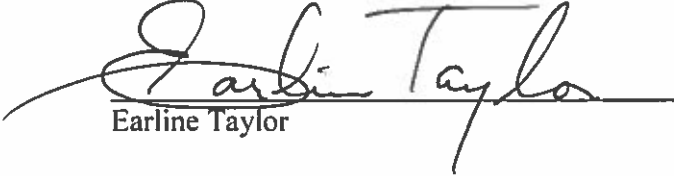
5. Our current Union contract provides for pay of \$13/hour for home care workers and for the State to pay into a health benefits fund and for training. In addition to the economic benefits of our contract, I believe the Union is important because it helps home care workers get more recognition for the work we do and helps change people's minds about the importance of home care. I believe the Union has made me a better caregiver by keeping me informed on current best practices in home care and on legislation affecting me and my client. As a home care worker, I believe I do critical work for clients who oftentimes have no one else to care for them. I believe it is necessary for us to have a strong Union to push us to do our jobs better, to help us do this work with pride and know that we are worth something.

6. I have had contact with the Union through the mailings I've received and the training classes I've attended. I've been to several training classes and every time I am reminded of all the great work the Union does for me and the importance of becoming a member. I am also reminded that while I support the Union and I intend to sign up to become a member, as of now, I have not.

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. The named plaintiffs do not speak for me. I believe that the fees I paid went to the Union to in turn help us as workers improve our lives and be better caregivers.

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

Executed this 11 day of September, 2015.


Earline Taylor