

Exhibit H

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ERIC WILKINS, MAHARI BELL,	)	
ESSENCE JEFFERSON, JOSE	)	
MANUEL ALMANZA, JR., AND	)	
JACQUEZ BEASLEY,	)	
	)	Case No. 23-cv-04072
Plaintiffs,	)	
	)	Hon. Mary M. Rowland
v.	)	
	)	
CITY OF CHICAGO,	)	
	)	
Defendant.	)	
	)	

**DECLARATION OF JOHN A. FREEDMAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

I, John A. Freedman, state as follows:

1. I am over the age of 18. I make this declaration based on my own personal knowledge, and, if called to testify, could and would testify as stated herein.
2. I am the Senior Pro Bono Counsel at Arnold & Porter Kaye Scholer LLP ("Arnold & Porter"), and supervise the Arnold & Porter team on this matter. Arnold & Porter is co-counsel of record for Plaintiffs and the Proposed Class in this matter.
3. This Declaration is submitted in support of Plaintiffs' Motion for Class Certification.
4. Arnold & Porter is an Am Law 100 firm with over 1,000 lawyers working in fifteen offices in the United States, Europe, and Asia. In the last five years, Arnold & Porter has litigated over 100 class actions and other cases involving aggregate claims.
5. I am a 1995 graduate of the Harvard Law School, and received my Bachelor's

degree from Williams College in 1991. Following my clerkship with Hon. Walter Jay Skinner in the District of Massachusetts, I joined Arnold & Porter in 1996. Prior to assuming my current role in 2020, was a partner in our litigation department starting in 2002. I am also a member in good standing of the Bars of Massachusetts, New York, and the District of Columbia, and numerous other federal trial and appellate courts.

6. Throughout my career, I have specialized in class action and other complex litigation involving a wide variety of commercial and civil rights issues. In the last several years, I have served as counsel for putative or certified classes in *Claros, et al. v. Nastos Construction, Inc.*, No. 1:09-cv-01888 (D.D.C.), *Little v. WMATA*, D.D.C. No. 1:14-cv-01289 (D.D.C.), *Cote v. Wal-Mart Stores*, D. Mass. No. 15-Civ.12945; *S.A. v. Trump*, N.D. Cal. 3:18-cv-3539, *Emami v. Mayorkas*, No. 18-cv-01587 (N.D. Cal.); *Costa v. Barzon*, D.D.C. 1:19-cv-3185, *Black Lives Matter D.C. v. Trump*, No. 1:20-cv-1469; *V.C. v. District of Columbia*, D.D.C. No. 1:23-cv-1139, and *Svitlana Doe et al. v. Noem*, D. Mass No. 1:25-cv-10495. I have also litigated class actions and class certification issues in federal district courts throughout the country, including *In re Municipal Derivatives Antitrust Litigation* (S.D.N.Y.); *In re SafeNet, Inc. Securities Fraud Litigation* (S.D.N.Y.); and *In re Qwest Communications Int'l Securities Litigation*, 396 F. Supp. 2d 1178 (D. Colo. 2004). I also have extensive experience litigating civil rights claims, including claims concerning misconduct by law enforcement officers; in addition to the *Black Lives Matter D.C.* matter, I also served as counsel in various challenges to police practices, including *Hispanic National Law Enforcement Association NCR v. Prince George's County*, D. Md. TDC-18-3821, *NAACP Delaware v. City of Wilmington*, D. Del. 1:23-cv-1205-GBW, *Jennell Black v. Russell Alexander*, D. Md 1:20-cv-3644-CCB, and *Marilu Romero-Hernandez v. District of Columbia*, D.D.C. No. 1:13-cv-1841-BAH.

7. Daniel E. Raymond is a litigation senior associate in Arnold & Porter's Chicago office and is also co-counsel for Plaintiffs and the Proposed Class in this matter. It is my understanding that Mr. Raymond received his J.D. from the University of Illinois College of Law in 2013, and his undergraduate degree from the University of Illinois Urbana-Champaign in 2010. Mr. Raymond is admitted to the bar of Illinois as well as the Northern District of Illinois and Seventh Circuit. Mr. Raymond has extensive experience representing clients in complex litigation, including class actions.

8. Emily A. Dorner is a litigation senior associate in Arnold & Porter's Chicago office and is also co-counsel for Plaintiffs and the Proposed Class in this matter. It is my understanding that Ms. Dorner received her J.D. from the Illinois Institute of Technology Chicago-Kent College of Law in 2014, and her undergraduate degree from Illinois Wesleyan University in 2010. Ms. Dorner is admitted to the bar of Illinois as well as the Northern District of Illinois. Ms. Dorner has extensive experience representing clients in complex litigation.

9. Andrew Hannemann is a litigation senior associate in Arnold & Porter's San Francisco office and is also co-counsel for Plaintiffs and the Proposed Class in this matter. It is my understanding that Mr. Hannemann received his J.D. from the Harvard Law School in 2018, and his undergraduate degree from Stanford University in 2011. Mr. Hannemann is admitted to the bar of California, and has been admitted in this case *pro hac vice*. Mr. Hannemann has extensive experience representing clients in complex litigation, including class actions.

10. Because of the years of experience in handling civil, immigration, and civil rights class actions and individual cases, I believe Mr. Raymond, Ms. Dorner, Mr. Hannemann and I, together with other members of our team and our experienced co-counsel at the ACLU of Illinois, will fairly and adequately represent the interests of the class proposed to be certified in

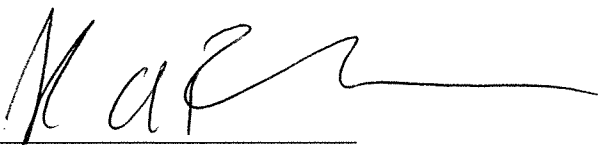
this case. In particular, the attorneys handling this case have knowledge of the applicable laws in this area and are qualified, experienced, and generally able to conduct the litigation of this case.

11. Arnold & Porter attorneys participated in investigating the facts that gave rise to this litigation and in drafting pleadings and motions, including the Motion for Class Certification. Arnold & Porter attorneys are familiar with the issues and are in a position to devote substantial resources to this litigation going forward. Arnold & Porter is representing the class *pro bono* and is not receiving reimbursement from the plaintiffs or class members in this case.

12. I do not anticipate any reason that class members would dispute the adequacy of Arnold & Porter's representation, and I am aware of no conflicts of interest between Arnold & Porter and any members of the class.

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

Dated: August 11, 2025



John A. Freedman