

**IN THE CIRCUIT COURT FOR THE SEVENTH JUDICIAL CIRCUIT
SANGAMON COUNTY, ILLINOIS**

CATHOLIC CHARITIES OF THE)
DIOCESE OF SPRINGFIELD-IN-)
ILLINOIS, an Illinois non-profit)
corporation, CATHOLIC CHARITIES OF)
THE DIOCESE OF PEORIA, an Illinois)
non-profit corporation, CATHOLIC)
CHARITIES OF THE DIOCESE OF)
JOLIET, INC., an Illinois non-profit)
corporation, and CATHOLIC SOCIAL)
SERVICES OF SOUTHERN ILLINOIS,)
DIOCESE OF BELLEVILLE, an Illinois)
non-profit corporation,)

Plaintiffs,)

v.)

STATE OF ILLINOIS, LISA MADIGAN,)
in her official capacity as the Attorney)
General of the State of Illinois, ERWIN)
McEWEN, in his official capacity as)
Director of the Department of Children)
and Family Services, State of Illinois, and)
the DEPARTMENT OF CHILDREN)
AND FAMILY SERVICES, State of)
Illinois, ROCCO J. CLAPPS in his official)
capacity as Director of the Department of)
Human Rights, State of Illinois, and the)
DEAPRTMENT OF HUMAN RIGHTS,)
State of Illinois,)

Defendants, and)

SUSAN TONE PIERCE, as Next Friend)
and on behalf of a certified class of all)
current and future foster children in)
custody of DCFS in a federal case titled)
B.H. v. McEwen, No. 88 cv 5589 (N.D. Ill.)
1988); SARAH RIDDLE and)
KATHERINE WESEMAN,)

Intervenors.)

Case No. 11-MR-254

Hon. John Schmidt
Presiding Judge

DECLARATION OF LORI TURNER

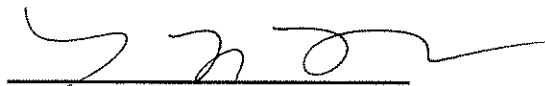
Lori Turner hereby declares as follows:

1. I am an attorney licensed to practice law in the State of Illinois and one of the attorneys for the intervenors in the above-captioned action. I make this Declaration based on my own personal knowledge and based upon the source described. This Declaration is submitted in support of Intervenors' Motion to Intervene.

2. Attached as Exhibit B to the Affidavit of Michael Shaver is a true and accurate copy of data provided to me as class counsel in *B.H. v. McEwen*, No. 88 c 5599 (N.D. Ill. 1988) by the Department of Children and Family Services on July 12, 2011.

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

Dated this 29th day of July, 2011.



Lori N. Turner
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