

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF KANSAS
KANSAS CITY DIVISION**

M.B. and **S.E.** through their next friend)
Katharyn McIntyre, **R.M.** through his next)
friend Allan Hazlett, **C.A.** through his next)
friend Allan Hazlett, **E.B.** through his next)
friend Allan Hazlett, **J.P.** through her next)
friend Allan Hazlett, **Z.Z.** through her next)
friend Ashley Thorne, and **M.A.** through his)
next friend Ashley Thorne, for themselves and)
those similarly situated,)

Case No. 2:18-cv-02617-DDC-GEB

Plaintiffs,

v.

Laura Howard in her official capacity as)
Kansas Department for Children and Families)
Secretary, **Dr. Lee A. Norman** in his official)
capacity as Kansas Department of Health and)
Environment Secretary, and **Laura**)
Howard in her official capacity as Kansas)
Department for Aging and Disability Services)
Secretary,)

Defendants.

DECLARATION OF LEECIA WELCH

I, Leecia Welch, do hereby declare:

1. I am the Senior Director of Legal Advocacy and Child Welfare at the National Center for Youth Law (NCYL). I represent Plaintiffs in the above-titled action. I submit this declaration in support of Plaintiffs’ Unopposed Motion for Final Approval of Class Action Settlement. I have personal knowledge of the facts stated in this declaration and, if called to testify, would testify competently to these facts.

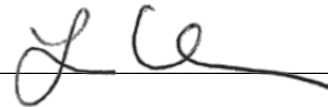
2. Plaintiffs' counsel has posted a copy of: (1) the parties' Settlement Agreement; (2) the Notice of Proposed Class Action Settlement; and (3) the Court's September 9, 2020, Order on the websites of both the National Center for Youth Law ([see http://youthlaw.org/case/mb-v-howard-settlement/](http://youthlaw.org/case/mb-v-howard-settlement/)) and Kansas Appleseed ([see http://kansasappleseed.org/mbvhoward.html](http://kansasappleseed.org/mbvhoward.html)).

3. In accordance with the Court's September 9, 2020 Order, I have been providing Defendants' counsel with a copy of objections, support, and other comments received regarding the proposed Settlement Agreement, as well as information relating to individuals who wish to appear personally and speak at the final approval hearing. I will continue to provide Defendants' counsel with this information on a rolling basis.

4. On or before December 14, 2020, Plaintiffs' Counsel will submit to the Court all written comments received, along with any responses from Plaintiffs' Counsel.

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

Executed this 30th day of November 2020 in San Francisco, California.

A handwritten signature in black ink, appearing to read 'Leecia Welch', is written over a horizontal line.

Leecia Welch