

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

EDWARD BANKS, *et al.*,

Plaintiffs-Petitioners,

v.

QUINCY BOOTH, in his official capacity  
as Director of the District of Columbia  
Department of Corrections, *et al.*,

Defendants-Respondents.

No. 1:20-cv-\_\_\_\_\_

**DECLARATION OF JONATHAN W. ANDERSON  
IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

I, Jonathan W. Anderson, declare as follows:

1. I am a member of the bar of this Court and one of the attorneys for the Plaintiffs in this matter.

2. I have been employed as the Chief of the Special Litigation Division of the Public Defender Service for the District of Columbia (PDS) since 2017, before which I served as a Supervising Attorney in the Appellate Division for approximately three years, and a Staff Attorney in the Appellate Division and the Trial Division for approximately thirteen years. During that time I have supervised and/or served as lead counsel in Habeas Corpus cases in this Court, the United States District Court for the Western District of Louisiana, and the United States District Court for the Middle District of Pennsylvania, supervised appeals in the District of Columbia Circuit Court of Appeals, supervised and served as lead counsel in criminal and post-conviction cases in the District of Columbia Court of Appeals, and supervised and/or served as lead counsel in criminal trials and post-conviction proceedings in the District of Columbia

Superior Court.

3. One of my co-counsel in this action is Jenna Cobb, who has been a Staff Attorney in the Special Litigation Division of PDS since 2014. Ms. Cobb has been lead counsel in a Habeas Corpus case pursuant to 28 U.S.C. § 2255 in this Court, is lead counsel in an appeal pending before the District of Columbia Circuit Court of Appeals, and has been lead counsel in numerous post-conviction cases in the District of Columbia Superior Court.

4. Another of my co-counsel in this action is Steven Marcus, who has been a Staff Attorney in the Special Litigation Division of PDS since 2018. Mr. Marcus is lead counsel in a class-action case pursuant to 5 U.S.C. § 500 and 28 U.S.C. § 2241 in this Court, a Habeas Corpus case pursuant to 28 U.S.C. § 2241 in the Western District of Louisiana, and numerous post-conviction cases in the District of Columbia Superior Court.

5. I believe that Mr. Marcus, Ms. Cobb, and I, together with our experienced co-counsel at the American Civil Liberties Union of the District of Columbia, will fairly and adequately represent the interests of the class proposed to be certified in this case.

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

Executed in Washington, D.C. on March 29, 2020.



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Jonathan W. Anderson