

Exhibit "C"

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

FLORENCE WALLACE, ET AL. : **CONSOLIDATED TO:**
 :
 Plaintiffs, : **CIVIL ACTION NO. 3:09-cv-0286**
 :
 v. :
 : **(JUDGE CAPUTO)**
 ROBERT J. POWELL, ET AL. :
 :
 Defendants. :
 :

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

WILLIAM CONWAY, ET AL. :
 :
 Plaintiffs, : **CIVIL ACTION NO. 3:09-cv-0291**
 :
 v. :
 : **(JUDGE CAPUTO)**
 MICHAEL T. CONAHAN, ET AL. :
 :
 Defendants. :
 :

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

H.T., ET AL. :
 :
 Plaintiffs, : **CIVIL ACTION NO. 3:09-cv-0357**
 :
 v. :
 : **(JUDGE CAPUTO)**
 MARK A. CIAVARELLA, ET AL. :
 :
 Defendants. :
 :

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

SAMANTHA HUMANIK,	:	
	:	
Plaintiffs,	:	CIVIL ACTION NO. 3:09-cv-0630
	:	
v.	:	
	:	(JUDGE CAPUTO)
MARK A. CIAVARELLA, JR.,	:	
ET AL.	:	
	:	
Defendants.	:	

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**DECLARATION OF JOSEPH J. FANTINI
IN SUPPORT OF PLAINTIFFS’ UNOPPOSED MOTION FOR
FINAL APPROVAL OF SETTLEMENT AND CLASS CERTIFICATION**

I, Joseph J. Fantini, state as follows:

1. I am an attorney at the law firm of Anapol Schwartz, counsel for Plaintiffs in *Conway v. Conahan*, No. 09-0291 (M.D. Pa.). I am a member of the Claims Committee in connection with Plaintiffs’ settlement with Defendants PA Child Care, LLC (“PACC”), Western PA Child Care, LLC (“WPACC”) and Mid-Atlantic Youth Services Corp. (“MAYS”) (collectively the “Provider Defendants”), (the “Settlement”), which is the subject of Plaintiffs’ Unopposed Motion for Final Approval of Settlement and Class Certification.

2. I make this declaration in support of Plaintiffs’ Unopposed Motion for Final Approval of Settlement and Class Certification.

3. On December 3, 2013, Anapol Schwartz entered into a contract with Document Technology, Inc. (“DTI”) where DTI was to send by first class mail a packet containing g the Legal Notice of a Class Action Settlement (“Class Notice”), the Proof of Claim Form, and the Authorization to Release Confidential Court Records and Information, each of which had been approved by the Court in its November 27, 2013 Preliminary Order (the “Notice Packet”), to the last known address of each Juvenile Class Member for whom the Claims Committee had a last known address.

4. Pursuant to the Court’s November 27, 2013, Order, I provided DTI with a mailing list containing the last name addressees of all individuals known to members of the Settlement Classes. The mailing list was compromised of: (a) the last known addresses of all individuals in the Settlement Classes provided to Settlement Class Counsel by the Luzerne County Juvenile Probation and the Domestic Relations branch of the Luzerne County Court of Common Pleas pursuant to the Court’s Order dated February 28, 2012; and (b) any new addresses that Class Counsel and/or Individual Plaintiffs’ Counsel received from potential Settlement Class members through the date of filing the Motion for Preliminary Approval of the Provider Defendants Settlement.

5. On December 10, 2013 DTI sent by first class mail delivery a Notice Packet to each Settlement Class Member for whom the Claims Committee had a last known address.

6. On December 10, 2013 DTI mailed a total of 3,795 Notice Packets.

7. After DTI's mailing, Anapol Schwartz received eighty-seven (87) Notice Packets returned to sender with forwarding addresses prior to the January 21, 2014, Proof of Claim deadline. Anapol Schwartz mailed by first class mail delivery a Notice Packet to the eighty-seven (87) forwarding addresses prior to the January 21, 2014, Proof of Claim deadline.

8. Thereafter, 778 Notice Packets were returned to Anapol Schwartz with no forwarding address.

9. At least 215 additional Notice Packets were mailed at the request of claimants after the December 10, 2013 mailing date.

10. On December 9, 2013, Anapol Schwartz contracted with 1-800 We Answer to establish a toll-free call center (the "Center"), the telephone number of which was included in the Class Notice.

11. The Center was staffed with non-lawyer Customer Service Representatives ("CSRs") who were trained to obtain contact information for each caller and respond to particular questions from Class Members concerning the litigation and the terms of the Settlement.

12. The Center was open to receive calls 24 hours a day, seven days a week from December 9, 2013 until February 2, 2014.

13. The Center answered over 1,559 calls from December 9, 2013 through February 2, 2014.

14. I created a form for the CSRs to complete for each caller to obtain the contact information of the caller and capture the content of the conversation.

15. After receiving a call, the CSR sent an email message with the form completed to myself at Anapol Schwartz, I noted the call in the claimant's file, returned some of the calls, and forwarded other of the calls to members of the Claims Committee for follow-up.

16. On February 2, 2014 Anapol Schwartz entered into another contract with the Center pursuant to which the Center played a pre-recorded message that I had created which directed callers to contact Anapol Schwartz directly at 215-735-1130 with any questions.

17. All callers to the Center heard the pre-recorded message from February 2, 2014 through April 28, 2014.

18. Following the mailing of the Notice Packet, Anapol Schwartz also received calls directly from persons seeking information about the Settlement.

19. I and others at Anapol Schwartz working under my direction returned calls from numerous callers, assisting callers in understanding the Settlement and the Proof of Claim Form.

20. I and others at Anapol Schwartz working under my direction also assisted callers in completing the forms necessary for the Claims Committee to obtain relevant documentation in support of claimants' claims.

21. When I and others at Anapol Schwartz working under my direction spoke with claimants, we informed them that they were free to continue to follow-up with us for answers to questions at any time in the future when they may require it.

22. I anticipate that after final approval of the Settlement, I am likely to continue to receive calls regarding the Allocation Plan.

23. Anapol Schwartz had previously contracted with Envoca Design to maintain an Internet website, www.kidswinsettlement.com, ("website") containing information about the litigation.

24. The website, which was first made available to the public on December 16, 2011, has remained available to the public since that time.

25. On December 3, 2013, the website was updated to indicate that the Court had recently Preliminarily Approved the Proposed Settlement between Plaintiffs and the Provider Defendants. On this date, the Master Settlement

Agreement (“MSA”) and the Court’s November 27, 2013, Order were made available.

26. On December 10, 2013, the website was again updated and provided copies of the MSA, Authorization to Release Records, Proof of Claim Form, Published Legal Notice of Class Action Settlement, Mailed Legal Notice of Class Action Settlement and the Court’s November 27, 2013, Order.

27. I understand from Envoca Design that, since December 3, 2013, the website has received 2,552 visits; 1,162 of which were unique visitors, meaning first-time visitors to the website.

28. Anapol Schwartz has maintained a Microsoft Access database of all Class Members, which is remotely accessible to all members of the Claims Committee.

29. All members of the Claims Committee have entered data and uploaded documents relating to claimants’ claims to the database.

30. This database includes, among other things, identifying information for all Class Members; Proof of Claim Forms and supporting documents received from claimants; records of correspondence with claimants; probation files of juvenile claimants produced by the Luzerne County Juvenile Probation Department; and records of payments made by parent claimants produced by the

Luzerne County Juvenile Probation Department and the Domestic Relations branch of the Luzerne County Court of Common Pleas.

31. By reference to this database, staff at Anapol Schwartz, working under my direction, have determined that the total number of potential Class Members is approximately 3,856.

32. By reference to this database, and in accordance with the Court's March 6 and April 14, 2014 Orders, staff at Anapol Schwartz, working under my direction, have determined that 2, 243 timely Proof of Claim Forms were received from claimants.

33. By reference to this database, staff at Anapol Schwartz, working under my direction, have determined that only nine (9) Class Members excluded themselves from the Settlement by timely opting out.

34. Anapol Schwartz has received no correspondence from Class Members that could be construed as objections to the Settlement.


35. During the pendency of the above-captioned actions, Anapol Schwartz has served as the repository for documents produced in discovery in these actions.

36. Anapol Schwartz has received over 350,000 pages of documents produced in discovery from Plaintiffs (including Plaintiff Fact Sheets), the Provider Defendants, and other Defendants in these actions, as well as juveniles'

files from the Luzerne County Juvenile Probation Department, records related to payment from the Luzerne County Juvenile Probation Departments, transcripts of proceedings before Ciavarella, and police reports from seventy-seven local and state police departments.

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

Executed on May 29, 2014.



Joseph J. Fantini