

EXHIBIT B

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

NOHORA RIVERO, et al.,

Plaintiffs,

v.

MONTGOMERY COUNTY,
MARYLAND, et al.,

Defendants.

Case No.: _____

AFFIDAVIT OF C. SHAWN BOEHRINGER

I, C. Shawn Boehringer, state the following in support of Plaintiffs' Motion for Preliminary Injunction:

1. My name is C. Shawn Boehringer. I am Chief Counsel of Plaintiff Legal Aid Bureau, Inc., a/k/a Maryland Legal Aid ("Legal Aid").
2. Legal Aid is a private, non-profit law firm organized under § 501(c)(3) of the Internal Revenue Code that provides free legal services to low-income people in Maryland (and, in the case of its Farmworker Program, to individuals in Delaware). Maryland Legal Aid is funded through contracts and grants with federal and state governments as well as through charitable contributions from individuals and foundations.
3. As part of its Farmworker Program, Maryland Legal Aid employees visit migrant and seasonal agricultural workers who live in employer-controlled housing on land owned by employers. The purpose of these visits is to inform workers of their rights under state and federal law to minimum

wage, overtime, safe housing, and workplace health and safety laws, to inform them of available social services, to distribute literature on common topics of concern to farmworkers, and to listen to any concerns the workers may have. On these visits, Maryland Legal Aid employees also offer and provide legal services, and enter into and continue attorney-client relationships. Efforts are made to visit each migrant labor camp in Maryland and Delaware at least once each year and to pay more frequent visits to camps at which labor concerns surface.

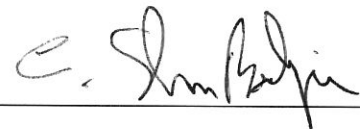
4. The Farmworker Program is primarily funded through grants from the Legal Services Corporation, a nonprofit corporation established by federal statute to promote equal access to justice and to fund legal assistance to low-income clients. Legal Aid's grant from the Legal Services Corporation permits it to perform outreach to migrant workers where they live.

5. Plaintiff Nohora Rivero has been employed with Legal Aid in the position of Law Graduate since 1993. She works with the Farmworker Program and conducts the routine visits described in ¶ 3.

6. Rivero's Spanish language skills and experience with migrant farmworkers make her extremely valuable and integral to the delivery of services to farmworkers. The no-trespass order issued on behalf of Defendant Montgomery County by Defendant Alexander Kettering effectively prevents Legal Aid from performing its mission with respect to migrant farmworkers employed by Defendants Fruits and Vegetables by Lewis Orchard, LLC, d/b/a Lewis Orchards ("Lewis Orchards"), Linda Lewis, and Robert Lewis.

7. Legal Aid desires to visit, speak with, and distribute literature to migrant farmworkers employed by Lewis Orchards, both presently and in the future. Defendants' actions, as set forth in the Complaint, effectively and unlawfully restrain Legal Aid's exercise of its First Amendment rights

I, C. Shawn Boehringer, solemnly swear or affirm under criminal penalties for the making of false statements that I have read the foregoing affidavit and that the factual statements made in it are true to the best of my knowledge, information, and belief.

 20 APRIL 2016

C. Shawn Boehringer

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Tyshana C.
Campbell
notary public
Commission expires:
April 15, 2020
