

# **EXHIBIT A**

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

NOHORA RIVERO, et al.,

Plaintiffs,

v.

MONTGOMERY COUNTY,  
MARYLAND, et al.,

Defendants.

Case No.: 8:16-cv-01186-PWG

**DECLARATION OF C. SHAWN BOEHRINGER**

I, C. Shawn Boehringer, declare pursuant to 28 U.S.C. § 1746:

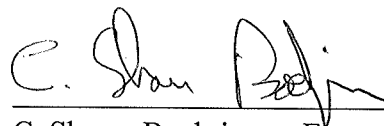
1. My name is C. Shawn Boehringer. I am the Chief Counsel at the Legal Aid Bureau, Inc. (“Maryland Legal Aid”). As Chief Counsel, I supervise the overall provision of legal services provided by our firm by more than 250 staff statewide.
2. In the latter part of 2015 after the incident referenced in Plaintiff’s first amended complaint in which Nohora Rivero and Spencer Evans were issued a no trespass order by the Montgomery County Police when attempting to conduct outreach to migrant farmworkers at the Lewis Orchards property on August 18 of that year, I discussed the matter with Nathaniel Norton, who was then the project director for Maryland Legal Aid’s migrant farmworker program.
3. Mr. Norton advised that he believed that the actions of the Lewis Orchards owners and the Montgomery County Police violated the law and wanted my blessing to involve the Maryland chapter of the American Civil Liberties Union (“ACLU”) to pursue a possible

lawsuit over the unlawful actions which would clarify that Maryland Legal Aid staff have the right to visit workers at Lewis Orchards and other farms employing migrant workers.

4. Maryland Legal Aid generally focusses its work on civil cases involving basic human needs – housing, income support, and family law. Our expertise has developed over many years of practice in the areas of landlord-tenant law, administrative hearings involving denial of a public benefit such as Supplemental Security Income, Unemployment Insurance, or Medical Assistance, family law cases involving child custody or protection from domestic violence, and representation of children in Maryland Children in Need of Assistance cases. On matters of complex tort or constitutional law, our staff has limited expertise and must often rely on experienced private co-counsel to litigate in those areas. It was therefore essential for us to retain outside private counsel to litigate this matter due to the complexity of the issues involved. Obtaining private counsel is particularly challenging for Maryland Legal Aid. As a non-profit law firm with limited funds to fulfill the mission of the organization, counsel agreeing to take the case pro bono was required for us to move forward with the case.
5. After discussing the facts of the Lewis Orchards case and Mr. Norton's understanding of the law, he was given approval to explore the ACLU's possible representation of Maryland Legal Aid in a case.
6. On October 13, 2015, Nathaniel e-mailed David Rocah at the Maryland ACLU and Sally Dworak-Fisher from the Public Justice Center in Maryland which outlined the incident involving Ms. Rivero and Mr. Evans and requested help from the ACLU.

7. The next involvement I had with the matter came around February 2016, when the ACLU advised that the Cohen Milstein firm had agreed to become involved in the case as co-counsel with the ACLU.
8. On March 10, 2016, I executed on behalf of the Legal Aid Bureau, Inc., an agreement whereby Legal Aid retained Cohen, Milstein, Sellers, and Toll and the American Civil Liberties Union Foundation of Maryland to represent it in the Lewis Orchards case.

Dated: November 28, 2016

A handwritten signature in black ink, appearing to read "C. Shawn Boehringer". The signature is written in a cursive style and is positioned above a horizontal line.

C. Shawn Boehringer, Esq.  
Chief Counsel  
Legal Aid Bureau, Inc.