

EXHIBIT I

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION**

REIYN KEOHANE, SASHA :
MENDOZA, SHEILA DIAMOND, :
KARTER JACKSON, :
NELSON BOOTHE, :

Plaintiffs,

v.

Case No. 4:24-cv-434-AW-MAF

RICKY D. DIXON, in his :
official capacity as Secretary :
of the Florida Department of :
Corrections; CLAYTON WEISS :
in his official capacity as Health :
Services Director of the Florida :
Department of Corrections; :
GARY HEWETT, in his official :
capacity as Warden of :
Wakulla Correctional Institution, :
ALONZO HORNER, in his :
official capacity as Warden of :
Homestead Correctional Institution; :
and NAN JEFFCOAT, in her official :
capacity as Warden of Florida :
Women's Reception Center, :

Defendants.

**DECLARATION OF DANIEL B. TILLEY IN SUPPORT OF PLAINTIFFS'
MOTION FOR CLASS CERTIFICATION**

My name is Daniel B. Tilley I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, pursuant to 28 U.S.C. § 1746, I declare:

1. I am the Legal Director for American Civil Liberties Union Foundation of Florida (“ACLU-FL”). I am Counsel of Record for Plaintiffs in this case.
2. I graduated from the University of Georgia School of Law and am a member in good standing of the Florida Bar and New York Bar. I am admitted in the Southern, Middle, and Northern Districts of Florida, the U.S. Court of Appeals for the Eleventh Circuit, the U.S. Court of Appeals for the Armed Forces, and the Supreme Court of the United States.
3. I submit this declaration in support of Plaintiffs’ Motion for Class Certification and to seek the appointment of ACLU-FL to serve as co-counsel for the proposed class along with counsel from the American Civil Liberties Union Foundation (“ACLU”) and Steptoe LLP. (Counsel at each of ACLU and Steptoe LLP will submit a separate declaration in support of their request to serve as class counsel).
4. My qualifications to serve as class counsel include more than twelve years with the ACLU-FL where I initially worked as a staff attorney specializing in issues affecting the LGBTQ+ community until I was promoted to Legal Director, a role where I now oversee legal teams working on a wide range of

civil-liberties issues and litigation. I previously was a clerk for two years with the Honorable U.S. Magistrate Judge Alan J. Baverman of the U.S. District Court for the Northern District of Georgia and for one year and three months with the Honorable Judge Margaret A. Ryan of the U.S. Court of Appeals for the Armed Forces.

5. Over the course of my career, I have represented numerous LGBTQ+ individuals to assert a variety of legal claims and defenses. *E.g.*, *Claire v. Fla. Dep't of Mgmt. Servs.*, 4:20-cv-20 (N.D. Fla.); *Love v. Young*, No. 2017-CA-1458 (Fla. 1st Cir. Ct.); *In re Merchant*, No. 1D15-1568 (Fla. 1st DCA); *Grimsley v. Scott*, No. 4:14-cv-128 (N.D. Fla.); *Carver Middle-School Gay-Straight Alliance v. School Board of Lake County, Florida*, No. 5:13-cv-623 (M.D. Fla.). These representations have also involved transgender individuals in custody. *E.g.*, *State v. Rodgers*, No. SC17-1050 (Fla.); *Keohane v. Jones*, 4:16-cv-511 (N.D. Fla.); *Hood v. Dep't of Children & Fams.*, No. 16-11204 (11th Cir.) (serving as amicus); *Naber v. Jones*, 2:15-cv-14427 (S.D. Fla.). And I have been counsel in cases that assert unlawful conditions in custody, including denial under the Eighth Amendment of necessary medical care for those in custody (among other provisions of law). *E.g.*, *Serrabi v. United States*, 3:24-cv-1212 (M.D. Fla.); *Glaze v. Wells*, No. 2021-CA-1369 (Fla. 12th Cir. Ct.); *Barnett v. Tony*, No. 0:20-cv-61113 (S.D. Fla.) (serving as class

counsel); *Higgins v. Inch*, No. 4:19-cv-308 (N.D. Fla.); *Keohane (supra)*; *Hood (supra)* (serving as amicus); *Naber (supra)*.

6. The ACLU-FL, founded in 1965 as a state affiliate of the ACLU, is a statewide, nonprofit, nonpartisan organization. Its mission is to protect, defend, strengthen, and promote the constitutional rights and liberties of all people in Florida.
7. I will be assisted in this matter by ACLU-FL staff attorney Samantha Past, who is a member of the legal department focused on LGBTQ+ rights and a graduate of Brooklyn Law School. She is a member of good standing of the Florida Bar, and admitted in the Southern, Middle, and Northern Districts of Florida as well as the U.S. Court of Appeals for the Eleventh Circuit.
8. The ACLU-FL has represented Plaintiffs in this matter since the filing of the initial complaint on October 25, 2025. For more than six months, the ACLU-FL has devoted many hours of attorney time and significant financial resources to investigate and assert Plaintiffs' claims—including interviewing Plaintiffs and other members of the proposed class to develop the factual record and legal issues underlying this case, reviewing documents provided by our clients and FDC, interviewing potential expert witnesses, performing legal research about potential claims and relief available to the Class, and

drafting, *inter alia*, a lengthy and detailed amended complaint, a motion for temporary and preliminary relief, and this class certification motion.

9. ACLU-FL has and will continue to dedicate substantial time and resources to the representation of the Plaintiffs and all putative class members in this case.

I, Daniel B. Tilley, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and recollection.

Dated: April 9, 2025

/s/ Daniel B. Tilley
Daniel B. Tilley
4343 West Flagler St.,
Suite 400
Miami, Florida 33134
Tel.: (786) 363-2714
dtalley@aclufl.org
*Counsel for Plaintiffs and the
Putative Class*