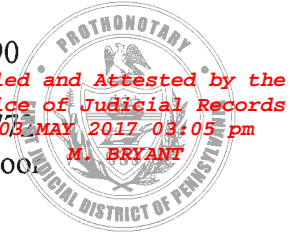


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**Pro hac vice motions forthcoming (additional counsel on signature page)*

FRANK LONG, JOSEPH SHIPLEY,
MICHAEL WHITE, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

SOUTHEASTERN PENNSYLVANIA
TRANSPORTATION AUTHORITY,

Defendant.

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY
CIVIL DIVISION

MAY TERM, 2017

No. _____.

CLASS ACTION

JURY TRIAL DEMANDED

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after the complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

PHILADELPHIA BAR ASSOCIATION
Lawyer Referral and Information Service
1101 Market Street, 11th Floor
Philadelphia, Pennsylvania 19107
(215) 238-1701

AVISO

“Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidira favor del demandante y require que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATA-MENTE SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

ASOCIACION DE LICENCIADOS DE
FILADELFIA
Servicio De Referencia E Informacion Legal
1101 Market Street, 11th Floor
Filadelfia, Pennsylvania 19107, (215) 238-1701

Plaintiffs Frank Long, Joseph Shipley, and Michael White (collectively, “Plaintiffs”), individually and on behalf of all others similarly situated, allege, upon personal knowledge as to themselves and upon information and belief as to other matters, as follows:

INTRODUCTION

1. Southeastern Pennsylvania Transportation Authority (“SEPTA” or “Defendant”), one of Philadelphia’s largest employers, rejects job applicants with criminal records even where the criminal history of the applicant does not have a relationship to their suitability for the job.

2. SEPTA’s overbroad and illegal policies and practices in screening job applicants with criminal records include an explicit policy (SEPTA Policy #E20) barring individuals with any felony or misdemeanor drug related convictions from employment in “[a]ll positions which require the operation of a SEPTA vehicles [sic]” or “positions requiring the maintenance, repair or operation of power facilities, substations, towers, signals, vehicles or rolling stock.”

3. This wholesale ban is unlawful under Pennsylvania’s Criminal History Record Information Act (“CHRIA”), 18 Pa.C.S. § 9125, which permits employers to consider convictions “only to the extent to which they relate to the applicant’s suitability for employment in the position for which he [or she] has applied.”

4. Plaintiffs, who each have old minor drug convictions and who were summarily denied employment based on SEPTA’s policy, bring this case on their own behalf and that of a proposed class of all others similarly situated against SEPTA for willful violation of CHRIA seeking injunctive and declaratory relief; actual, real and/or statutory damages; exemplary and punitive damages; pre-judgment and post-judgment interest; and reasonable attorneys’ fees, costs, and expenses associated with this action. *See* 18 Pa.C.S. § 9183.

STATUTORY BACKGROUND

5. In Pennsylvania, “every citizen has an inalienable right to engage in lawful employment.” *Sec’y of Revenue v. John’s Vending Corp.*, 453 Pa. 488, 493 (1973).

6. Moreover, Pennsylvania has a “deeply ingrained public policy . . . to avoid unwarranted stigmatization of and unreasonable restrictions upon” individuals with criminal records. *Id.* at 492.

7. CHRIA is an expression of Pennsylvania’s strong public policy in the employment sphere.

8. It provides that, “[f]elony and misdemeanor convictions may be considered by the employer *only* to the extent to which they relate to the applicant’s suitability for employment in the position for which he has applied.” 18 Pa.C.S. § 9125(b) (emphasis added).

9. Denying employment to applicants with unrelated drug convictions undermines and violates CHRIA.

10. It is an unwarranted stigmatization and unreasonable restriction on the economic opportunities of vulnerable populations, impacting countless Philadelphia residents.

11. The use of such arbitrary pre-employment bans also furthers stigmatization on the basis of race, ethnicity, color, and national origin because it imports the racial and ethnic disparities in the criminal justice system into the employment application process (even though this disparate impact is not the direct target of this lawsuit).

JURISDICTION AND VENUE

12. This Court has jurisdiction pursuant to 42 Pa.C.S § 931(a).

13. Venue is proper pursuant to Pa. R.C.P. 1006 and 2179(a) because a transaction or occurrence giving rise to Plaintiffs’ cause of action took place in Philadelphia County,

Pennsylvania, Defendant is domiciled and does business in Philadelphia County, Pennsylvania and Defendant's principal place of business is in Philadelphia County, Pennsylvania.

14. On April 25, 2016, this matter was originally filed in the U.S. District Court for the Eastern District of Pennsylvania, as part of a case raising claims under both federal and state laws.

15. On April 5, 2017, the U.S. District Court for the Eastern District of Pennsylvania dismissed the federal claims for lack of jurisdiction and declined to exercise supplemental jurisdiction of the state law claims.

16. Plaintiffs in this action seek in excess of \$50,000.00 in monetary damages, and hence the amount in dispute exceeds the amount requiring arbitration pursuant to local rule Philadelphia Civil Rule 1303.

17. Accordingly, this case is properly brought in the Court of Common Pleas.

PARTIES

Plaintiffs

18. Plaintiffs and the proposed Class Members they seek to represent are employment applicants and persons aggrieved for the purposes of CHRIA.

Frank Long

19. Mr. Long is a 57-year-old resident of Philadelphia, Pennsylvania. At the time of his application to SEPTA, Mr. Long was working as a bus driver for a Philadelphia-based school bus company. Prior to that, he worked in the warehouse division of a national healthcare company for over 12 years.

20. Mr. Long has regularly volunteered his time to his community, working with neighborhood watch programs, community garden clean-ups, and youth and senior citizens programs through his church.

21. In or about October 2014, Mr. Long applied for the position of Bus Operator with SEPTA.

22. On or about October 17, 2014, Mr. Long interviewed for a Bus Operator position with SEPTA.

Joseph Shipley

23. Mr. Shipley is a 46-year-old resident of Philadelphia, Pennsylvania. At the time of his application to SEPTA, Mr. Shipley was working as a conductor for an international transportation company. Prior to that, Mr. Shipley worked for approximately two years as a Transportation Counselor for a company transporting juveniles from court to school.

24. In or about October 2015, Mr. Shipley applied for the position of Railroad Supervision Manager with SEPTA.

25. On or about January 28, 2016, Mr. Shipley interviewed for a Railroad Supervision Manager position with SEPTA.

Michael White

26. Mr. White is a 34-year-old resident of Philadelphia, Pennsylvania. At the time of his application to SEPTA, Mr. White had been working as a delivery driver for approximately two years. Prior to that, he worked as a driver and delivery clerk for another company for approximately one-and-a-half years.

27. In or about April 2015, Mr. White applied for the position of Bus Operator with SEPTA.

28. On or about April 29, 2015, Mr. White interviewed for a Bus Operator position with SEPTA.

Defendant

29. SEPTA operates the United States' sixth-largest public transportation system. It services over 750,000 passengers on a weekday and employs approximately 9,000 employees.

30. SEPTA is a public transit authority organized under the laws of the Commonwealth of Pennsylvania and maintains its headquarters at 1234 Market Street, Philadelphia, Pennsylvania 19107.

31. At all relevant times, SEPTA has been an "employer" and a "person" and/or an "organization" for purposes of CHRIA.

32. At all relevant times, SEPTA has been aware of the requirements of CHRIA and yet has disregarded those requirements.

STATEMENT OF FACTS

Plaintiff Long's Experience

33. In or about October 2014, Mr. Long applied to be a Bus Operator with SEPTA.

34. On or about October 17, 2014, Mr. Long interviewed with a SEPTA recruiter for the Bus Operator position.

35. At that interview, Mr. Long discussed the experiences that qualified him for the position, including his Commercial Driver's License and his job as a school bus driver at the time of the interview.

36. The recruiter told Mr. Long that he thought Mr. Long would be a good driver, that he interviewed well, and that he was qualified for the position.

37. Consequently, on the same day of the interview, the recruiter extended an oral offer of employment to Mr. Long contingent on a background check.

38. At SEPTA's behest, Mr. Long completed a SEPTA form disclosing that he has a criminal history and authorizing SEPTA to conduct a background check.

39. In or about late October 2014, the recruiter called Mr. Long revoking the offer of employment for the Bus Operator position based on Mr. Long's criminal history. The recruiter told Mr. Long that he could try applying for a Maintenance Custodian position with SEPTA.

40. When Mr. Long called back to get more information about the custodian position, the recruiter told him that SEPTA did not hire convicted felons.

41. On his record, Mr. Long had 1997 drug convictions for possession and manufacture of a controlled substance originating from a single 1994 arrest. Mr. Long's criminal history was not relevant to the Bus Operator position for which he applied, for reasons including the nature of the crime, the age of the conviction, his employment history, and the years Mr. Long has been in the general population without any further convictions.

42. Over four months later, and only after repeated follow-up by Mr. Long, in or about early March 2015, Mr. Long received a letter from SEPTA's Human Resources Division Recruitment Manager stating that "based on [its] hiring criteria," SEPTA had decided not to hire Mr. Long for the Bus Operator position. The correspondence indicated that this decision was made from the information SEPTA had received from his background check, which was conducted by Security Care. The report enclosed with the letter indicated that Security Care completed the background check back in November 2014.

Plaintiff Shipley's Experience

43. In or about October 2015, Mr. Shipley applied to be a Railroad Supervision Manager with SEPTA.

44. On or about January 28, 2016, Mr. Shipley interviewed with a SEPTA employee for the Railroad Supervision Manager position.

45. Pursuant to SEPTA's policies, the Railroad Supervision Manager position is considered a position involving the operation and/or maintenance of SEPTA vehicles.

46. At that interview, Mr. Shipley discussed the experiences that qualified him for the position, including his significant experience working for transportation companies.

47. At SEPTA's behest, Mr. Shipley completed two SEPTA forms disclosing that he has a criminal history and authorizing SEPTA to conduct a background check.

48. Mr. Shipley's interview went well and he was offered the position by SEPTA on approximately February 29, 2016.

49. On approximately March 22, 2016, Mr. Shipley received a letter from SEPTA informing him about SEPTA's new hire orientation scheduled for March 28, 2016.

50. Approximately two days later, Mr. Shipley received a telephone call from a SEPTA recruiter telling him not to report to work and that his background check had not been cleared.

51. On approximately March 25, 2016, the SEPTA recruiter called Mr. Shipley back and told him that SEPTA was denying him the Railroad Supervision Manager position because of his criminal history, followed by a letter stating the same.

52. In response to Mr. Shipley's request for more information, SEPTA sent him a second letter from its counsel, dated April 26, 2016, notifying Mr. Shipley that SEPTA

disqualified him pursuant to its categorical lifetime ban on hiring anyone who was convicted of a crime “involving the possession, sale, distribution, manufacture and use of controlled substances,” for “[a]ll positions which require the operation of a SEPTA vehicles as part thereof, whether or not they are in revenue service” and “[a]ll positions requiring the maintenance, repair or operation of power facilities, substations, towers, signals, vehicles or rolling stock,” and enclosed a copy of SEPTA Policy #E20 with the relevant section highlighted.

53. On his record, Mr. Shipley has a 2001 drug-related conviction arising out of a single arrest.

54. Mr. Shipley’s criminal history was not relevant to the Railroad Supervisor Manager position for which he applied, for reasons including the nature of the crime, the age of the conviction, his employment history, and the years Mr. Shipley has been in the general population without any further convictions.

Plaintiff White’s Experience

55. In or about April 2015, Mr. White applied to be a Bus Operator with SEPTA.

56. On or about April 29, 2015, Mr. White interviewed with a SEPTA employee for the Bus Operator position.

57. At that interview, Mr. White discussed the experiences that qualified him for the position, including his job as a deliver driver at the time of the interview and that he had recently obtained his Commercial Driver’s License.

58. At SEPTA’s behest, Mr. White completed a SEPTA form disclosing that he has a criminal history and authorizing SEPTA to conduct a background check.

59. Mr. White’s interview went well, and he was told by the SEPTA employee with whom he interviewed that he would receive more information about starting training.

60. Mr. White followed up with SEPTA repeatedly and was told that SEPTA was waiting on the results of his background check.

61. Approximately six months after his interview and following Mr. White's numerous follow up, Mr. White received a letter from SEPTA denying him the Bus Operator position because of his criminal history.

62. On his record, Mr. White was convicted of drug-related offenses in 2006 and 2007.

63. Mr. White's criminal history was not relevant to the Bus Operator position for which he applied for reasons including the nature of the crime, the age of the conviction, his employment history, and the years Mr. White has been in the general population without any further convictions.

Factual Allegations Common to All Class Members

64. CHRIA provides that, "[f]elony and misdemeanor convictions may be considered by the employer only to the extent to which they relate to the applicant's suitability for employment in the position for which he has applied." 18 Pa.C.S. § 9125(b).

65. CHRIA further states that, "[t]he employer shall notify in writing the applicant if the decision not to hire the applicant is based in whole or in part on criminal history record information." 18 Pa.C.S. § 9125(c).

66. Despite CHRIA's clear directive, SEPTA routinely violates the law through its blanket policy and practice (including SEPTA Policy #E20) of disqualifying job applicants with unrelated drug convictions from employment in positions involving the operation of SEPTA vehicles. *See* 18 Pa.C.S. § 9125(b).

67. SEPTA knew or should have known its obligations under CHRIA—including not to use broad blanket exemptions regarding criminal conviction histories and instead to limit use only to those situations where criminal conviction histories in fact established non-suitability for a particular position. These obligations are well-established by the plain language of CHRIA and in longstanding case law.

68. Through its actions, SEPTA has acted willfully in violating the requirements of CHRIA.

CLASS ACTION ALLEGATIONS

69. Plaintiffs bring this case as a “class action” within the scope and meaning of Pa.R.C.P. 1701(a) on behalf of a Class defined as follows:

All applicants for employment with SEPTA in the United States during the applicable statute of limitations period through the date of final judgment who were denied SEPTA employment involving the operation and/or maintenance of SEPTA non-paratransit vehicles based in whole or in part on a drug-related conviction unrelated to their suitability for to job to which they applied.

70. The members of the Class are collectively referred to as “Class Members.”

71. Plaintiffs reserve the right to amend the definition of above-defined class based on discovery or legal developments.

72. Numerosity: The Class Members identified herein are so numerous that joinder of all members is impracticable. SEPTA employs approximately 9,000 employees. Although Plaintiffs do not know the precise number of job applicants harmed by SEPTA’s violations of CHRIA, the number is far greater than feasibly could be addressed through joinder. The precise number is also uniquely within Defendant’s possession and the Class Members may be notified of the pendency of this action by published and/or mailed notice. Accordingly, the Class

satisfies the numerosity standard as the Class is so numerous that joinder of all Class Members in a single action is impracticable. Pa.R.C.P. 1702(1).

73. Commonality: There are questions of law and fact common to Class Members, and these questions predominate over any questions affecting only individual members.

Common legal and factual questions include, among others:

- (a) whether Defendant violated CHRIA by denying employment to Plaintiffs and the Class based on their criminal convictions;
- (b) whether Defendant was willful in its noncompliance with the requirements of CHRIA; and
- (c) whether equitable remedies, injunctive relief, actual damages, statutory damages, compensatory damages, exemplary damages and punitive damages for Class Members are warranted.

74. Class certification is appropriate for the Class because common questions of fact and law predominate over any questions affecting only individual Class Member. For example, SEPTA has maintained a common policy of denying employment because of drug related convictions, and because a class action is superior to other available methods for the fair and efficient adjudication of this litigation. Class Members have been damaged and are entitled to recovery as a result of Defendant's uniform policies and practices. The questions set forth above predominate over any questions affecting only individual persons and a class action is superior with respect to considerations of consistency, economy, efficiency, fairness, and equity to other available methods for the fair and efficient adjudication of the claim. Pa.R.C.P. 1702(2) & 1708(a)(1).

75. Typicality: Plaintiffs are members of the classes they seek to represent. SEPTA denied Plaintiffs employment based on their criminal convictions and without those criminal convictions being related to Plaintiffs' suitability for employment in the positions for which they applied, violating CHRIA. Plaintiffs' claims are typical of the claims of the class they seek to represent. Upon information and belief, it is SEPTA's standard practice to consider drug convictions that do not relate to applicants' suitability for employment involving the operation of SEPTA vehicles when making hiring determinations for employment. Plaintiffs are entitled to relief under the same causes of action as other Class Members. Pa.R.C.P. 1702(3).

76. Adequacy: Plaintiffs will fairly and adequately represent and protect the interests of the Class Members pursuant to Pa.R.C.P. 1702(4) & 1709 because their interests coincide with, and are not antagonistic to, the interests of the Class Members they seek to represent. Plaintiffs have retained Counsel who are competent and experienced in complex class actions, including litigation pertaining to criminal background checks and other employment litigation, and the intersection thereof. There is no conflict between Plaintiffs and the Class Members. Pa.R.C.P. 1702(4) & 1709.

77. Fair and Efficient Method of Adjudication. The size of the class and the difficulties likely to be encountered in the management of the action as a class action are reasonable and not excessive to the point where they impair the economies of scale inherent in representative actions. Pa.R.C.P. 1702(5) and 1708(a)(2).

78. Due to the size of the Class, prosecution of separate actions by individual members of the class would create a risk of inconsistent or varying adjudications that would confront Defendant with incompatible standards of conduct and adjudications with respect to individual members of the class that would as a practical matter be dispositive of the interests of

other members not parties to the adjudications or substantially impair or impede their ability to protect their interests. Pa.R.C.P. 1708(a)(3).

79. To the Plaintiffs' knowledge, and after a good-faith search of court records, no other litigation has already been commenced by or against members of the class involving any of the same issues. Pa.R.C.P. 1708(a)(4).

80. This particular forum is appropriate for the litigation of the claims of the entire class as Defendant is located in the City and County of Philadelphia, Pennsylvania and the same Pennsylvania law applies to all class members. Pa.R.C.P. 1708(a)(5).

81. The amount of each Class Member's individual claim is also small compared to the expense and burden of individual prosecution of this litigation. The propriety and amount of exemplary and punitive damages are based on Defendant's conduct, making these issues common to Class Members. Pa.R.C.P. 1708(a)(6) and (a)(7).

82. Class certification is appropriate because SEPTA has acted and/or refused to act on grounds generally applicable to the Class Members, making declaratory and injunctive relief appropriate with respect to Plaintiffs and the Class Members as a whole. The Class Members are entitled to injunctive relief to end Defendant's common, uniform, unfair discriminatory—and illegal—policies and practices.

83. Plaintiffs intend to send notice to all members of the Class Members to the extent required by Pa.R.C.P. 1712. The names and addresses of the class members are available from Defendant's records.

CAUSE OF ACTION

SEPTA's Violation of CHRIA's Use of Information Provision (18 Pa. Cons. Stat. Ann. § 9125, Brought by Plaintiffs on Behalf of Themselves and CHRIA Job Denial Class)

84. Plaintiffs, on behalf of themselves and the Class Members, incorporate the preceding paragraphs as alleged above.

85. Plaintiffs and the Class Members have criminal drug convictions that SEPTA considered when deciding not to offer them employment involving the operation of SEPTA vehicles.

86. Plaintiffs' and the Class Members' convictions are not related to their suitability for employment involving the operation or maintenance of SEPTA non-paratransit vehicles.

87. Plaintiffs and the Class Members have been aggrieved by SEPTA's denials of employment.

88. Rather than making assessments of what drug related crimes related to the suitability of applicants for particular jobs, SEPTA applied an across the board prohibition for a wide range of positions, in violation of the explicit statutory prohibition in CHRIA.

89. As a result of the denials of employment, and the manner in which those denials occur, Plaintiffs allege that SEPTA rejects all applicants with applicable criminal records, whether or not they were job related, denying job opportunities to all those with criminal records to the detriment of Plaintiffs and the Class.

90. As a result of its actions, SEPTA is liable to Plaintiffs and the Class Members for injunctive relief, damages and reasonable costs of litigation, and attorneys' fees, pursuant to 18 Pa.C.S. § 9183(a)-(b).

91. SEPTA's conduct has been willful, rendering it liable for exemplary and punitive damages, pursuant to 18 Pa.C.S. § 9183(b).

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs and Class Members pray for relief as follows:

- (a) Determining that this action may proceed as a class action under Pa.R.C.P. 1708;
- (b) Designating Plaintiffs as Class Representatives;
- (c) Designating Plaintiffs' counsel as counsel for the Class;
- (d) Issuing proper notice to the Class at SEPTA's expense;
- (e) Declaring that SEPTA violated CHRIA;
- (f) An order enjoining SEPTA from engaging in further unlawful conduct in violation of CHRIA;
- (g) Declaring that SEPTA acted willfully under CHRIA;
- (h) An award of all statutory damages provided by CHRIA, including actual and real damages for each violation, and exemplary and punitive damages for each violation found to be willful;
- (i) An award of costs incurred herein, including reasonable attorneys' fees to the extent allowable by law;
- (j) An award of reasonable attorneys' fees and costs as provided by CHRIA;
- (k) Pre-judgment and post-judgment interest, as provided by law;
- (l) Payment of a reasonable service award to Mr. Long, Mr. Shipley, and Mr. White, in recognition of the services they have rendered, and will continue

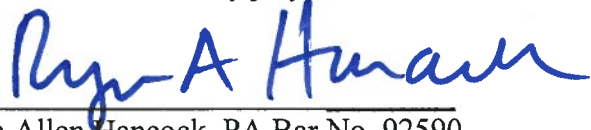
to render to the Class Members, and the risks they have taken and will take; and

- (m) Granting other and further relief, in law or equity, as this Court may deem appropriate and just.

JURY TRIAL

Plaintiffs hereby request a trial by jury of all issues triable by jury.

Date: 5/3/17



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Christopher M. McNerney (*pro hac vice* motion forthcoming)

Cheryl-Lyn Bentley (*pro hac vice* motion forthcoming)

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(202) 662-8600

Jon Greenbaum (*pro hac vice* motion forthcoming)

Mateya Kelley (*pro hac vice* motion forthcoming)

Attorneys for Plaintiffs and Proposed Class

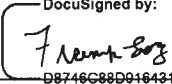
FRANK LONG, JOSEPH SHIPLEY,	:	COURT OF COMMON PLEAS
MICHAEL WHITE, individually and on	:	PHILADELPHIA COUNTY
behalf of all others similarly situated,	:	
	:	
Plaintiffs,	:	APRIL TERM, 2017
	:	
v.	:	No. _____.
	:	
SOUTHEASTERN PENNSYLVANIA	:	
TRANSPORTATION AUTHORITY,	:	
	:	
Defendant.	:	
	:	

VERIFICATION

I, Frank Long, hereby state that I am the Plaintiff in this action, that I have read the foregoing Class Action Complaint, and that the allegations contained therein are true and correct to the best of my knowledge, information, and belief.

I understand that the statements in this Verification are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

Dated: 5/2/2017

DocuSigned by:

DB746C88D916431...
 Frank Long


FRANK LONG, JOSEPH SHIPLEY,	:	COURT OF COMMON PLEAS
MICHAEL WHITE, individually and on	:	PHILADELPHIA COUNTY
behalf of all others similarly situated,	:	
	:	
Plaintiffs,	:	APRIL TERM, 2017
v.	:	No. _____
	:	
SOUTHEASTERN PENNSYLVANIA	:	
TRANSPORTATION AUTHORITY,	:	
	:	
Defendant.	:	
	:	

VERIFICATION

I, Joseph Shipley, hereby state that I am the Plaintiff in this action, that I have read the foregoing Class Action Complaint, and that the allegations contained therein are true and correct to the best of my knowledge, information, and belief.

I understand that the statements in this Verification are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

Dated: 5/3/2017

DocuSigned by:

802808021870460

 Joseph Shipley

	:	COURT OF COMMON PLEAS
FRANK LONG, JOSEPH SHIPLEY,	:	PHILADELPHIA COUNTY
MICHAEL WHITE, individually and on	:	
behalf of all others similarly situated,	:	
	:	
Plaintiffs,	:	APRIL TERM, 2017
v.	:	No. _____.
	:	
SOUTHEASTERN PENNSYLVANIA	:	
TRANSPORTATION AUTHORITY,	:	
	:	
Defendant.	:	
	:	

VERIFICATION

I, Michael White, hereby state that I am the Plaintiff in this action, that I have read the foregoing Class Action Complaint, and that the allegations contained therein are true and correct to the best of my knowledge, information, and belief.

I understand that the statements in this Verification are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

Dated: 5/2/2017

DocuSigned by:

6504A11660004C0
 Michael White