

## Exhibit A

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JUDITH ANNE HAYES, individually  
and on behalf of W.H., a minor, *et al.*

CASE NO: 1:21-cv-22863-KMM

Plaintiffs,

v.

GOVERNOR RONALD DION DESANTIS, in his official  
Capacity as Governor of the State of Florida; *et al.*,

Defendants.

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**DECLARATION OF RYAN SCHLIP.**


COMES NOW, Ryan Schlip and pursuant to 28 U.S.C. § 1748, declares under penalty of perjury that the foregoing is true and correct:

1. My name is Ryan Schlip, and I am over 18 years old and have personal knowledge of the facts as stated herein.
2. I am the father of W.S., my nine-year-old son.
3. W.S. lives with attention deficit hyperactivity disorder (ADHD).
4. W.S. attended public school in Brevard County until August 9, 2021. The school district has identified W.S. as a student with a disability and provided him with an Individualized Education Plan.
5. My wife and I have ICU experience and my wife is a medical expert and based upon our experience believe that it was too dangerous for W.S. to return to school in person as no one can guarantee his safety and he is too young to be vaccinated.
6. No one from the district has provided me with any alternatives or accommodations so that W.S. can remain safe while still attending public school and receiving an appropriate and inclusive education.
7. Having been provided with no other options, we enrolled our son in Florida Virtual School (FLVS). I was left with having to decide whether to risk W.S.'s life or leave the public school system and the opportunity for W.S. to receive a free appropriate public education.

*Declaration of Ryan Schlip*  
*Page 2 of 2*

8. I am seeking a reinstatement of a "full panoply of services" including but not limited to requirements to follow CDC guidelines including the wearing of masks in schools and live synchronous and asynchronous instruction with the same curriculum as in person instruction and the ability to interact with a student's teacher and peers equal to the options provided to nondisabled students.

FURTHER DECLARANT SAYETH NAUGHT.

  
\_\_\_\_\_  
Ryan Schlip

08/23/2021  
Date

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JUDITH ANNE HAYES, individually  
and on behalf of W.H., a minor, *et al.*

CASE NO: 1:21-cv-22863-KMM

Plaintiffs,

v.

GOVERNOR RONALD DION DESANTIS, in his official  
Capacity as Governor of the State of Florida; *et al.*,

Defendants.

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**DECLARATION OF JESSICA SANCHEZ**

COMES NOW, Jessica Sanchez and pursuant to 28 U.S.C. § 1748, declares under penalty  
of perjury that the foregoing is true and correct:

1. My name is Jessica Sanchez, and I am over 18 years old and have personal knowledge of the facts as stated herein.
2. I am the mother of E.S., my ten-year-old son.
3. E.S. lives with an autism spectrum disorder and asthma.
4. E.S. attends a public school in Broward County. The school district has identified E.S. as a student with a disability and has provided him with an Individualized Education Plan. E.S. is instructed in ESE classrooms with certified ESE teachers throughout the school day.
5. Their doctor has advised me that it is too dangerous for E.S. to return to school in person at this time as he is at greater risk for severe illness or death should he contract Covid-19.
6. No one from the district has provided me with any other alternatives or accommodations so that E.S. can remain safe while still attending public school and receiving a free appropriate public education in the least restrictive environment as he is entitled to.
7. I do not have the financial ability or the training to homeschool E.S. Thus, I am left with having to decide whether to risk E.S.'s life or leave the public school system and the opportunity for E.S. to receive a free appropriate public education in the least restrictive environment.



*Declaration of Jessica Sanchez*  
*Page 2 of 2*

8. I am seeking a reinstatement of a “full panoply of services” including but not limited to requirements to follow CDC guidelines including the wearing of masks in schools and live synchronous and asynchronous instruction with the same curriculum as in person instruction and the ability to interact with a student’s teacher and peers equal to the options provided to nondisabled students.

FURTHER DECLARANT SAYETH NAUGHT.

Jessica Sanchez  
Jessica Sanchez

8/23/2021  
Date

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JUDITH ANNE HAYES, individually  
and on behalf of W.H., a minor, *et al.*

CASE NO: 1:21-cv-22863-KMM

Plaintiffs,

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GOVERNOR RONALD DION DESANTIS, in his official  
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Defendants.

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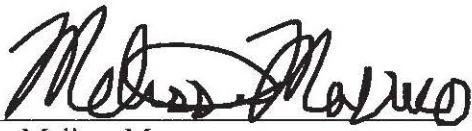
**DECLARATION OF MELISSA MARRERO.**

COMES NOW, Melissa Marrero and pursuant to 28 U.S.C. § 1748, declares under penalty of perjury that the foregoing is true and correct:

1. My name is Melissa Marrero, and I am over 18 years old and have personal knowledge of the facts as stated herein.
2. I am the mother of G.M., my eight-year-old daughter.
3. G.M. lives with an autism spectrum disorder.
4. G.M. attends a public school in Broward County. The school district has identified G.M. as a student with a disability and has provided her with an Individualized Education Plan.
5. Their doctor has advised me that it is too dangerous for G.M. to return to school in person as no one can guarantee their safety.
6. No one from the district has provided me with any other alternatives or accommodations so that G.M. can remain safe while still attending public school and receiving a free appropriate public education as he is entitled.
7. I do not have the financial ability or the training to homeschool G.M. Thus, I am left with having to decide whether to risk G.M.'s life or leave the public school system and the opportunity for G.M. to receive a free appropriate public education.
8. I am seeking a reinstatement of a "full panoply of services" including but not limited to requirements to follow CDC guidelines including the wearing of masks in schools and live synchronous and asynchronous instruction with the same curriculum as in person instruction and the ability to interact with a student's teacher and peers equal to the options provided to nondisabled students.

*Declaration of Melissa Marrero*  
*Page 2 of 2*

FURTHER DECLARANT SAYETH NAUGHT.

A handwritten signature in black ink, appearing to read "Melissa Marrero", written over a horizontal line.

Melissa Marrero

8/20/2021

Date

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JUDITH ANNE HAYES, individually  
and on behalf of W.H., a minor, *et al.*

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Defendants.

---

**DECLARATION OF TIFFANY BATTEL**

COMES NOW, Tiffany Battel and pursuant to 28 U.S.C. § 1748, declares under penalty  
of perjury that the foregoing is true and correct:

1. My name is Tiffany Battel, and I am over 18 years old and have personal knowledge of the facts as stated herein.
2. I am the mother of A.B., my eight-year-old daughter.
3. A.B. lives with cerebral palsy.
4. A.B. attends public school in Broward County. The school district has identified A.B. as a student with a disability and has provided her with an Individualized Education Plan.
5. A.B. does not have the use of her hands and needs assistance with eating and manipulating classroom materials. In addition, she uses her nose to manipulate her iPad and other augmented communication devices. She is necessarily in close contact with other people at school.
6. A.B.'s doctor has advised me that it is too dangerous for her to return to school in person because no one can guarantee her safety.
7. The district has provided no accommodations or alternatives to attend school in person. Instead, the district suggested I apply to be considered for a hospital homebound program with the district. Such a program, if we were to qualify, will not provide a free appropriate public education in the least restrictive environment, will not provide A.B. access to her peers nor will it provide her with the benefits of being on a school campus like any other student. A.B. would be isolated in her home unnecessarily and I would be forced to stay home with A.B. I understand that the hours per week of instruction will be

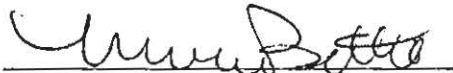
*Declaration of Tiffany Battel*

*Page 2 of 2*

limited and will likely be provided online. A.B. will not receive a full school day nor have the benefit of any electives or extracurricular activities like art or music in the hospital homebound program.

8. I am left with having to decide whether to risk A.B.'s life or leave the public school system and the opportunity for A.B. to receive a free appropriate public education.
9. I am seeking a reinstatement of a "full panoply of services" including but not limited to requirements to follow CDC guidelines including the wearing of masks in schools and live synchronous and asynchronous instruction with the same curriculum as in person instruction and the ability to interact with a student's teacher and peers equal to the options provided to nondisabled students.

FURTHER DECLARANT SAYETH NAUGHT.

  
Tiffany Battel

8/18/21  
Date



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JUDITH ANNE HAYES, individually  
and on behalf of W.H., a minor, *et al.*

CASE NO: 1:21-cv-22863-KMM

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---

**DECLARATION OF MELANIE SPARROW.**

COMES NOW, Melanie Sparrow and pursuant to 28 U.S.C. § 1748, declares under  
penalty of perjury that the foregoing is true and correct:

1. My name is Melanie Sparrow, and I am over 18 years old and have personal knowledge of the facts as stated herein.
2. I am the mother of K.S., my eight-year-old daughter.
3. K.S. lives with cerebral palsy and has an intellectual disability.
4. K.S. attends public school in Clay County. The school district has identified K.S. as a student with a disability and has provided her with an Individualized Education Plan. K.S. is educated on a modified curriculum also known as Access Points.
5. K.S.'s doctor has advised me that it is too dangerous for K.S. to return to school in person because no one can guarantee her safety and she is too young to be vaccinated.
6. No one from the district has provided me with any options or accommodations so that K.S. can remain safe while still attending public school and receiving an appropriate and inclusive education.
7. Instead, the school principal suggested I apply to be considered for a hospital homebound program with the district. There was no guarantee made by the principal that K.S. would qualify. Such a program, if we were to qualify, will not provide a free appropriate public education in the least restrictive environment, will not provide K.S. access to her peers nor will it provide her with the benefits of being on a school campus like any other student. K.S. would be isolated in her home unnecessarily and I would be forced to stay home with



*Declaration of Melanie Sparrow*  
*Page 2 of 2*

K.S. I understand that the hours per week of instruction will be limited and will likely be provided virtually. K.S. will not receive a full school day nor have the benefit of any electives or extracurricular activities such as art or music in the hospital homebound program.

8. If K.S. is not approved for Hospital Homebound, I will have to homeschool her because there are no online programs that provide Access Point curriculum with direct instruction from a certified ESE teacher. I do not have the financial ability or the training to homeschool K.S. Thus, I am left with having to decide whether to risk K.S.'s life or leave the public school system and the opportunity for her to receive a free appropriate public education.
9. I am seeking a reinstatement of a "full panoply of services" including but not limited to requirements to follow CDC guidelines including the wearing of masks in schools and live synchronous and asynchronous instruction with the same curriculum as in person instruction and the ability to interact with a student's teacher and peers equal to the options provided to nondisabled students.

FURTHER DECLARANT SAYETH NAUGHT.

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Melanie Sparrow

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Date

9. I am seeking a reinstatement of a "full panoply of services" including but not limited to requirements to follow CDC guidelines including the wearing of masks in schools and live synchronous and asynchronous instruction with the same curriculum as in person instruction and the ability to interact with a student's teacher and peers equal to the options provided to nondisabled students.

FURTHER DECLARANT SAYETH NAUGHT.

  
\_\_\_\_\_  
Melanie Sparrow

8.23.2021  
\_\_\_\_\_  
Date

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JUDITH ANNE HAYES, individually  
and on behalf of W.H., a minor, *et al.*

CASE NO: 1:21-cv-22863-KMM

Plaintiffs,

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GOVERNOR RONALD DION DESANTIS, in his official  
Capacity as Governor of the State of Florida; *et al.*,

Defendants.

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**DECLARATION OF ANGELICA DEL VALLE.**

COMES NOW, Angelica Del Valle and pursuant to 28 U.S.C. § 1748, declares under  
penalty of perjury that the foregoing is true and correct:

1. My name is Angelica Del Valle, and I am over 18 years old and have personal knowledge of the facts as stated herein.
2. I am the mother of Z.D., my seven-year-old son.
3. Z.D. lives with attention deficit hyperactive disorder (ADHD) and has a history of trouble breathing.
4. Z.D. attends public school in Hillsborough County. Z.D. has been identified by the school district has a student with a disability and has been provided with a 504 plan.
5. Z.D.'s doctor has advised me that it is too dangerous for him to return to school in person because no one can guarantee his safety.
6. No one from the district has provided me with any alternatives, options or accommodations so that Z.D. can remain safe while still attending public school and receiving an appropriate and inclusive education.
7. I do not have the financial ability or the training to homeschool Z.D. Thus, I am left with having to decide whether to risk Z.D.'s life or leave the public school system.
8. I am seeking a reinstatement of a "full panoply of services" including but not limited to requirements to follow CDC guidelines including the wearing of masks in schools and live synchronous and asynchronous instruction with the same curriculum as in person

*Declaration of Angelica Del Valle*  
*Page 2 of 2*

instruction and the ability to interact with a student's teacher and peers equal to the options provided to nondisabled students.

FURTHER DECLARANT SAYETH NAUGHT.

Angelica Del Valle  
Angelica Del Valle

8/18/2021  
Date

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JUDITH ANNE HAYES, individually  
and on behalf of W.H., a minor, *et al.*

CASE NO: 1:21-cv-22863-KMM

Plaintiffs,

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GOVERNOR RONALD DION DESANTIS, in his official  
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Defendants.

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**DECLARATION OF MELISSA RANIERI**

COMES NOW, Melissa Ranieri and pursuant to 28 U.S.C. § 1748, declares under penalty  
of perjury that the foregoing is true and correct:

1. My name is Melissa Ranieri, and I am over 18 years old and have personal knowledge of the facts as stated herein.
2. I am the mother of E.R., my ten-year-old son.
3. E.R. is a kidney transplant recipient.
4. E.R. attends school in Hillsborough County. The school district has identified E.R. as a student with a disability and provided with a 504 plan.
5. E.R.'s doctor has advised me that it is too dangerous for E.R. to return to school in person at this time because E.R. is more susceptible because his immune system is compromised due to him having had a kidney transplant so thus if he contracts Covid-19 he is at higher risk of severe illness or death.
6. No one from the district has provided me with any alternatives, options or accommodations so that E.R. can remain safe while still attending public school and receive an appropriate and inclusive education.
7. I do not have the financial ability or the training to homeschool E.R. Thus, I am left with having to decide whether to risk E.R.'s life or leave the public school system and the opportunity for E.R. to receive an appropriate education.

*Declaration of Melissa Ranieri*

*Page 2 of 2*

8. I am seeking a reinstatement of a “full panoply of services” including but not limited to requirements to follow CDC guidelines including the wearing of masks in schools and live synchronous and asynchronous instruction with the same curriculum as in person instruction and the ability to interact with a student’s teacher and peers equal to the options provided to nondisabled students.

FURTHER DECLARANT SAYETH NAUGHT.



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Melissa Ranieri

8/21/2001

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Date



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JUDITH ANNE HAYES, individually  
and on behalf of W.H., a minor, *et al.*

CASE NO: 1:21-cv-22863-KMM

Plaintiffs,

v.

GOVERNOR RONALD DION DESANTIS, in his official  
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Defendants.

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**DECLARATION OF ANA MARIA PRADA.**

COMES NOW, Ana Maria Prada and pursuant to 28 U.S.C. § 1748, declares under penalty  
of perjury that the foregoing is true and correct:

1. My name is Ana Maria Prada, and I am over 18 years old and have personal knowledge of the facts as stated herein.
2. I am the mother of M.D., my eleven-year-old daughter.
3. M.D. lives with an autism spectrum disorder and an intellectual disability. It is further suspected that M.D. has epilepsy.
4. M.D. attends public school in Lake County. The school district has identified M.D. as a student with a disability and provided her with an Individualized Education Plan. M.D. is being educated on a modified curriculum also known as Access Points.
5. M.D.'s doctor has advised me that it is too dangerous for her to return to school in person because no one can guarantee her safety. M.D. is too young to be vaccinated.
6. No one from the district has provided me with any alternatives, options or accommodations so that M.D. can remain safe while still attending public school and receiving a free appropriate public education she is entitled to. There are few, if any, online programs that provide direct instruction from a certified ESE teacher for students who are on a modified curriculum.
7. I do not have the financial ability or the training to homeschool M.D. Thus, I am left with having to decide whether to risk M.D.'s life or leave the public school system and the opportunity for M.D. to receive a free appropriate public education.

*Declaration of Ana Maria Prada*  
*Page 2 of 2*

8. I am seeking a reinstatement of a "full panoply of services" including but not limited to requirements to follow CDC guidelines including the wearing of masks in schools and live synchronous and asynchronous instruction with the same curriculum as in person instruction and the ability to interact with a student's teacher and peers equal to the options provided to nondisabled students.

FURTHER DECLARANT SAYETH NAUGHT.

  
Ana Maria Prada

August 23, 2021  
Date

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JUDITH ANNE HAYES, individually  
and on behalf of W.H., a minor, *et al.*

CASE NO: 1:21-cv-22863-KMM

Plaintiffs,

v.

GOVERNOR RONALD DION DESANTIS, in his official  
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Defendants.

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**DECLARATION OF MATTHEW ANTHONY DEMARCO.**

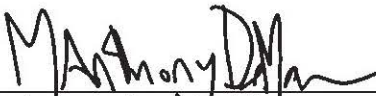
COMES NOW, Matthew Anthony DeMarco and pursuant to 28 U.S.C. § 1748, declares  
under penalty of perjury that the foregoing is true and correct:

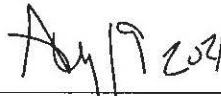
1. My name is Matthew Anthony DeMarco, and I am over 18 years old and have personal knowledge of the facts as stated herein.
2. I am the father of A.D., my thirteen-year-old son.
3. A.D. lives with Shone's Complex. Shone's Complex is a rare congenital heart disease consisting of multiple left heart obstructive defects. A.D. has had two open heart surgeries with a third coming up in the near future. A.D. has a pacemaker medical implant. A.D. is sick often, A.D. often develops severe upper respiratory illnesses, A.D. has asthma, and is at great risk of severe illness or death if he contracts Covid-19.
4. A.D. attended public school in Leon County. A.D. has been identified by the school district as a student with a disability and has been provided with a 504 plan.
5. A.D. had to leave the public school system in January 2020 because of the risks of Covid-19. A.D. attended school through an online program but did not do well and is falling behind. I intended to return A.D. to the public school system for the 2021-2022 school year until it became clear that it was again not safe for A.D.
6. A.D. has several Doctors and Specialists. I've contacted all of them and it is too dangerous for A.D. to return to brick-and-mortar school because no one can guarantee his safety.
7. No one from the district has provided me with any alternatives, options or accommodations so that A.D. can return to school safely.

*Declaration of Matthew Anthony DeMarco*  
*Page 2 of 2*

8. It will be devastating for A.D. if he is forced to miss more school and direct instruction from certified teachers. He has already fallen behind his peers academically and socially. But I am left once again with having to decide whether to risk A.D.'s life or leave the public school system again for this school year.
9. I am seeking a reinstatement of a "full panoply of services" including but not limited to requirements to follow CDC guidelines including the wearing of masks in schools and live synchronous and asynchronous instruction with the same curriculum as in person instruction and the ability to interact with a student's teacher and peers equal to the options provided to nondisabled students.

FURTHER DECLARANT SAYETH NAUGHT.

  
Matthew Anthony DeMarco

  
Date

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JUDITH ANNE HAYES, individually  
and on behalf of W.H., a minor, *et al.*

CASE NO: 1:21-cv-22863-KMM

Plaintiffs,

v.

GOVERNOR RONALD DION DESANTIS, in his official  
Capacity as Governor of the State of Florida; *et al.*,

Defendants.

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**DECLARATION OF DIANE URBANSKI**

COMES NOW, Diane Urbanski and pursuant to 28 U.S.C. § 1748, declares under penalty  
of perjury that the foregoing is true and correct:

1. My name is Diane Urbanski, and I am over 18 years old and have personal knowledge of the facts as stated herein.
2. I am the mother of L.A., my twelve-year-old son.
3. L.A. lives with Congenital Adrenal Hyperplasia and ulcerative colitis.
4. L.A. attends a public school in Orange County. The school district has identified L.A. as a student with a disability and has provided 504 plan.
5. I believe at this time it is too dangerous for L.A. to return to school in person as he is at greater risk for severe illness or death should he contract Covid-19.
6. No one from the district has provided me with any other alternatives or accommodations so that L.A. can remain safe while still attending public school and receiving an appropriate and inclusive education. If L.A. does not attend in person, he will lose his spot in his school.
7. I do not have the financial ability or the training to homeschool L.A. Thus, I am left with having to decide whether to risk L.A.'s life or leave the public school system and the opportunity for L.A. to receive an appropriate education.
8. I am seeking a reinstatement of a "full panoply of services" including but not limited to requirements to follow CDC guidelines including the wearing of masks in schools and live synchronous and asynchronous instruction with the same curriculum as in person



*Declaration of Diane Urbanski*  
*Page 2 of 2*

instruction and the ability to interact with a student's teacher and peers equal to the options provided to nondisabled students.

FURTHER DECLARANT SAYETH NAUGHT.

**Diane Urbanski**  
\_\_\_\_\_  
Diane Urbanski

8/23/2021  
\_\_\_\_\_  
Date



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JUDITH ANNE HAYES, individually  
and on behalf of W.H., a minor, *et al.*

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Plaintiffs,

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Capacity as Governor of the State of Florida; *et al.*,

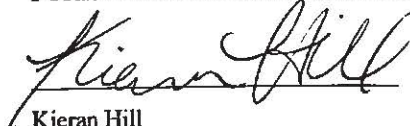
Defendants.

DECLARATION OF KIERAN HILL.

COMES NOW, Kieran Hill and pursuant to 28 U.S.C. § 1748, declares under penalty of perjury that the foregoing is true and correct:

1. My name is Kieran Hill, and I am over 18 years old and have personal knowledge of the facts as stated herein.
2. I am the father of K.H., my eight-year-old son.
3. K.H. lives with Down Syndrome.
4. K.H. attends public school in Orange County. The school district has identified K.H. as a student with a disability and provided him with an Individualized Education Plan.
5. K.H.'s doctor has advised me that it is too dangerous for him to return to school in person as no one can guarantee his safety. As with many students with Down Syndrome, K.H. is uniquely vulnerable to severe illness or death should he contract Covid-19.
6. No one from the district has provided me with any alternatives or accommodations so that K.H. can remain safe while still attending public school and receiving an appropriate and inclusive education.
7. I do not have the financial ability or the training to homeschool K.H. Thus, I am left with having to decide whether to risk K.H.'s life or leave the public school system and the opportunity for K.H. to receive a free appropriate public education.
8. I am seeking a reinstatement of a "full panoply of services" including but not limited to requirements to follow CDC guidelines including the wearing of masks in schools and live synchronous and asynchronous instruction with the same curriculum as in person instruction and the ability to interact with a student's teacher and peers equal to the options provided to nondisabled students.

FURTHER DECLARANT SAYETH NAUGHT.

  
Kieran Hill

8/19/21  
Date

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JUDITH ANNE HAYES, individually  
and on behalf of W.H., a minor, *et al.*

CASE NO: 1:21-cv-22863-KMM

Plaintiffs,

v.

GOVERNOR RONALD DION DESANTIS, in his official  
Capacity as Governor of the State of Florida; *et al.*,

Defendants.

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**DECLARATION OF LEE SELTZER.**

COMES NOW, Lee Seltzer and pursuant to 28 U.S.C. § 1748, declares under penalty of perjury that the foregoing is true and correct:

1. My name is Lee Seltzer, and I am over 18 years old and have personal knowledge of the facts as stated herein.
2. I am the father of W.S., my eight-year-old son.
3. W.S. lives with a severe peanut allergy, which alters how his immune system reacts to pathogens.
4. W.S. attends public school in Orange County. The school district has identified W.S. as a student with a disability and provided him with a 504 plan.
5. W. qualifies as for a Section 504 plan since kindergarten because his serious allergy was noted as substantially limiting his ability to breathe. If he has contact with peanuts, he can go into anaphylactic shock, which includes his throat closing and a severe allergic reaction.
6. He is fully integrated into his classroom and his school, and the teachers and cafeteria staff all understand his disability and know how to use an EpiPen if he comes into contact with peanuts.
7. As part of the school's operations and the 504 plan, W.'s school has an allergy table in the cafeteria where he may eat, in addition, he is permitted to wash his hands at all times, and the parents are permitted to go on all field trips with him to ensure his safety.

*Declaration of Lee Seltzer*  
*Page 2 of 2*

8. W is permitted to go to all activities involving food, and the school staff is specifically trained to ensure that he does not have contact with peanuts or those who have recently eaten peanuts.
9. With the implementation of simple precautions, my child could go to school. I am also aware that some schools in Orange County are peanut-free because of the allergies of their students. Because my son is undergoing treatment, an allergen-free environment is not required for him.
10. If a student had a "right" to eat peanuts in school, my child would be excluded from his education. Similarly, because he does have an impaired immune system, W.S.'s doctor has advised me that it is too dangerous for him to return to school in person as no one can guarantee his safety.
11. While its simple enough to stop a person who has eaten peanuts to breathe or touch my son, no one from the district has provided me with any alternatives or accommodations so that W.S. can remain safe from COVID-19 while still attending public school and receiving an appropriate and inclusive education.
12. I do not have the financial ability or the training to homeschool W.S. Thus, I am left with having to decide whether to risk W.S.'s life or leave the public school system.
13. I am seeking a reinstatement of a "full panoply of services" including but not limited to requirements to follow CDC guidelines including the wearing of masks in schools and live synchronous and asynchronous instruction with the same curriculum as in person instruction and the ability to interact with a student's teacher and peers equal to the options provided to nondisabled students.

FURTHER DECLARANT SAYETH NAUGHT.

  
Lee Seltzer

8/22/2021  
Date

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JUDITH ANNE HAYES, individually  
and on behalf of W.H., a minor, *et al.*

CASE NO: 1:21-cv-22863-KMM

Plaintiffs,

v.

GOVERNOR RONALD DION DESANTIS, in his official  
Capacity as Governor of the State of Florida; *et al.*,

Defendants.

---

**DECLARATION OF MELISSA VACCA.**

COMES NOW, Melissa Vacca and pursuant to 28 U.S.C. § 1748, declares under penalty  
of perjury that the foregoing is true and correct:

1. My name is Melissa Vacca, and I am over 18 years old and have personal knowledge of the facts as stated herein.
2. I am the mother of S.V., my eight-year-old daughter.
3. S.V. lives with type 1 diabetes.
4. S.V. attends a public school in Orange County. The school district has identified S.V. as a student with a disability and has provided her with a 504 plan.
5. Their doctor has advised me that it is too dangerous for S.V. to return to school in person as no one can guarantee their safety.
6. No one from the district has provided me with any other alternatives or accommodations so that S.V. can remain safe while still attending public school and receiving an appropriate and inclusive education.
7. I do not have the financial ability or the training to homeschool S.V. Thus, I am left with having to decide whether to risk S.V.'s life or leave the public school system.
8. I am seeking a reinstatement of a "full panoply of services" including but not limited to requirements to follow CDC guidelines including the wearing of masks in schools and live synchronous and asynchronous instruction with the same curriculum as in person



*Declaration of Melissa Vacca*  
*Page 2 of 2*

instruction and the ability to interact with a student's teacher and peers equal to the options provided to nondisabled students.

FURTHER DECLARANT SAYETH NAUGHT.

A handwritten signature in black ink, appearing to read "Melissa Vacca", written over a horizontal line.

Melissa Vacca

8/23/2021

Date

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JUDITH ANNE HAYES, individually  
and on behalf of W.H., a minor, *et al.*

CASE NO: 1:21-cv-22863-KMM

Plaintiffs,

v.

GOVERNOR RONALD DION DESANTIS, in his official  
Capacity as Governor of the State of Florida; *et al.*,

Defendants.

---

**DECLARATION OF TAMIJA LYLES.**

COMES NOW, Tamika Lyles and pursuant to 28 U.S.C. § 1748, declares under penalty of perjury that the foregoing is true and correct:

1. My name is Tamika Lyles, and I am over 18 years old and have personal knowledge of the facts as stated herein.
2. I am the mother of M.A., my fifteen-year-old son.
3. M.A. lives with severe asthma and learning disabilities.
4. M.A. attends public school in Osceola County. The school district has identified M.A. as a student with a disability and has provided M.A. with an Individualized Education Plan.
5. M.A.'s doctor has advised me that it is too dangerous for him to return school in person at this time because no one can guarantee his safety. The school district will not notify parents if their child has been in contact with anyone who has tested positive of Covid-19.
6. No one from the district has provided me with any options or accommodations so that M.A. can remain safe while still attending public school and receiving a free appropriate public education. Osceola Virtual school and Florida Virtual school are no longer taking new students and further if an online program were to become available, they do not often, if ever, offer IB classes needed for the IB program. M.A. will lose his spot in the IB program.
7. I am left with having to decide whether to risk M.A.'s life or leave the public school system and the opportunity for M.A. to receive a free appropriate public education and the benefits of being in the IB program.



*Declaration of Tamika Lyles*  
*Page 2 of 2*

8. I am seeking a reinstatement of a “full panoply of services” including but not limited to requirements to follow CDC guidelines including the wearing of masks in schools and live synchronous and asynchronous instruction with the same curriculum as in person instruction and the ability to interact with a student’s teacher and peers equal to the options provided to nondisabled students.

FURTHER DECLARANT SAYETH NAUGHT.

*Tamika Lyles*  
Tamika Lyles

8/23/2021  
Date

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JUDITH ANNE HAYES, individually  
and on behalf of W.H., a minor, *et al.*

CASE NO: 1:21-cv-22863-KMM

Plaintiffs,

v.

GOVERNOR RONALD DION DESANTIS, in his official  
Capacity as Governor of the State of Florida; *et al.*,

Defendants.

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**DECLARATION OF ANTHONY NIEVES.**

COMES NOW, Anthony Nieves and pursuant to 28 U.S.C. § 1748, declares under penalty of perjury that the foregoing is true and correct:

1. My name is Anthony Nieves, and I am over 18 years old and have personal knowledge of the facts as stated herein.
2. I am the father of A.N., my seven-year-old son.
3. A.N. lives with an autism spectrum disorder and severe allergies. A.N. is nonverbal.
4. A.N. attends a charter school operated by Osceola County. The school district has identified A.N. as a student with a disability and provided him with an Individualized Education Plan.
5. A.N. requires a modified curriculum also known as an Access Points curriculum, but the school district refuses to provide any remote options out of fear of financial repercussions from the county and state.
6. A.N.'s doctor has advised me that it is too dangerous for him to return to school in person as no one can guarantee his safety.
7. No one from the district has provided me with any alternatives or accommodations so that A.N. can remain safe while still attending public school and receiving a free appropriate public education as he is entitled.
8. I do not have the financial ability or the training to homeschool A.N. Thus, I am left with having to decide whether to risk A.N.'s life or leave the public school system and the opportunity for A.N. to receive a free appropriate public education.

*Declaration of Anthony Nieves*

*Page 2 of 2*

9. I am seeking a reinstatement of a "full panoply of services" including but not limited to requirements to follow CDC guidelines including the wearing of masks in schools and live synchronous and asynchronous instruction with the same curriculum as in person instruction and the ability to interact with a student's teacher and peers equal to the options provided to nondisabled students.

FURTHER DECLARANT SAYETH NAUGHT.

  
\_\_\_\_\_  
Anthony Nieves

08/20/2021  
\_\_\_\_\_  
Date

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JUDITH ANNE HAYES, individually  
and on behalf of W.H., a minor, *et al.*

CASE NO: 1:21-cv-22863-KMM

Plaintiffs,

v.

GOVERNOR RONALD DION DESANTIS, in his official  
Capacity as Governor of the State of Florida; *et al.*,

Defendants.

---

**DECLARATION OF BRUNIA BEAUBRUN.**

COMES NOW, Brunia Beaubrun and pursuant to 28 U.S.C. § 1748, declares under penalty of perjury that the foregoing is true and correct:

1. My name is Brunia Beaubrun, and I am over 18 years old and have personal knowledge of the facts as stated herein.
2. I am the mother of C.A., my eleven-year-old son.
3. C.A. lives with an autism spectrum disorder, severe asthma, an anxiety disorder, and attention deficit hyperactivity disorder (ADHD).
4. C.A. attends public school in Palm Beach County. The school district has identified C.A. as a student with a disability and C.A. has been provided with an Individualized Education Plan.
5. C.A.'s doctor has advised me that it is too dangerous for him to return to school in person because no one can guarantee his safety.
6. No one from the district has provided me with any alternatives, options or accommodations so that C.A. can remain safe while still attending public school and receiving an appropriate and inclusive education.
7. I do not have the financial ability or the training to homeschool C.A. Thus, I am left with having to decide whether to risk C.A.'s life or leave the public school system and the opportunity for C.A. to receive a free appropriate public education.

*Declaration of Brunia Beaubrun*

*Page 2 of 2*

8. I am seeking a reinstatement of a "full panoply of services" including but not limited to requirements to follow CDC guidelines including the wearing of masks in schools and live synchronous and asynchronous instruction with the same curriculum as in person instruction and the ability to interact with a student's teacher and peers equal to the options provided to nondisabled students.

FURTHER DECLARANT SAYETH NAUGHT.

  
\_\_\_\_\_  
Brunia Beaubrun

8-18-21  
\_\_\_\_\_  
Date



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JUDITH ANNE HAYES, individually  
and on behalf of W.H., a minor, *et al.*

CASE NO: 1:21-cv-22863-KMM

Plaintiffs,

v.

GOVERNOR RONALD DION DESANTIS, in his official  
Capacity as Governor of the State of Florida; *et al.*,

Defendants.

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Chiet

**DECLARATION OF KATIE CHIET**

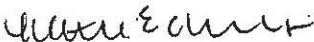
COMES NOW, Katie Chiet and pursuant to 28 U.S.C. § 1748, declares under penalty of perjury that the foregoing is true and correct:

1. My name is Katie Chiet, and I am over 18 years old and have personal knowledge of the facts as stated herein.
2. I am the mother of C.S., my eight-year-old son.
3. C.S. lives with multiple disabilities including an autism spectrum disorder and deletion syndrome which is a disorder caused when a small part of chromosome 22 is missing. He is also immunocompromised and has a heart defect known as Tetralogy of Fallot.
4. C.S. attends school in Palm Beach County. The school district has identified C.S. as a student with a disability and provided an Individualized Education Plan.
5. C.S.'s doctor has advised me that it is too dangerous for C.S. to return to school in person at this time because C.S. is more susceptible to respiratory illness so should he contract Covid-19 he is at higher risk of severe illness or death. While there is a mask mandate in place, it is only in place for the next 90 days and C.S. would need accommodations at lunch to ensure his safety while students are eating unmasked.
6. No one from the district has provided me with any alternatives, options or accommodations so that C.S. can remain safe while still attending public school and receiving a free appropriate public education in the least restrictive environment.
7. I was left with having to decide whether to risk C.S.'s life or leave the public school system and the opportunity for C.S. to receive a free appropriate public education.

*Declaration of Katie Chiet*  
*Page 2 of 2*

8. I am seeking a reinstatement of a "full panoply of services" including but not limited to requirements to follow CDC guidelines including the wearing of masks in schools and live synchronous and asynchronous instruction with the same curriculum as in person instruction and the ability to interact with a student's teacher and peers equal to the options provided to nondisabled students.

FURTHER DECLARANT SAYETH NAUGHT.

  
Katie Chiet

8/23/21  
Date

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JUDITH ANNE HAYES, individually  
and on behalf of W.H., a minor, *et al.*

CASE NO: 1:21-cv-22863-KMM

Plaintiffs,

v.

GOVERNOR RONALD DION DESANTIS, in his official  
Capacity as Governor of the State of Florida; *et al.*,

Defendants.

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**DECLARATION OF DANIELLE LINSKOTT.**

COMES NOW, Danielle Linscott and pursuant to 28 U.S.C. § 1748, declares under penalty  
of perjury that the foregoing is true and correct:

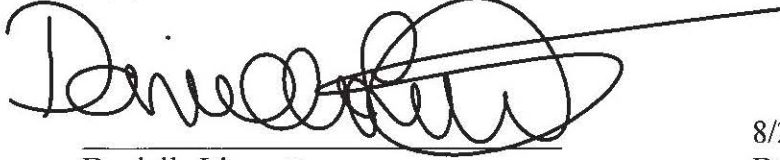
1. My name is Danielle Linscott, and I am over 18 years old and have personal knowledge of the facts as stated herein.
2. I am the mother of J.L., my three-year-old son, and L.L., my three-year old daughter.
3. J.L. lives with an autism spectrum disorder and dermal sinus tract disorder. He is also Deaf and the left side of his brain does not function.
4. L.L. has severe learning delays and is nonverbal.
5. J.L. and L.L. attend public schools in Palm Beach County. The school district has identified both of my children as students with a disability and provided them with Individualized Education Plans.
6. Their doctor has advised me that it is too dangerous for my children to return to school in person as no one can guarantee their safety.
7. No one from the district has provided me with any other alternatives or accommodations so that J.L. and L.L. can remain safe while still attending public school and receiving a free appropriate public education as he is entitled.
8. I do not have the financial ability or the training to homeschool J.L. and L.L. Thus, I am left with having to decide whether to risk their lives or leave the public school system and the opportunity for my children to receive a free appropriate public education.

*Declaration of Danielle Linscott*

*Page 2 of 2*

9. I am seeking a reinstatement of a "full panoply of services" including but not limited to requirements to follow CDC guidelines including the wearing of masks in schools and live synchronous and asynchronous instruction with the same curriculum as in person instruction and the ability to interact with a student's teacher and peers equal to the options provided to nondisabled students.

FURTHER DECLARANT SAYETH NAUGHT.

A handwritten signature in black ink, appearing to read 'Danielle Linscott', written over a horizontal line.

Danielle Linscott

8/23/2021

Date

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JUDITH ANNE HAYES, individually  
and on behalf of W.H., a minor, *et al.*

CASE NO: 1:21-cv-22863-KMM

Plaintiffs,

v.

GOVERNOR RONALD DION DESANTIS, in his official  
Capacity as Governor of the State of Florida; *et al.*,

Defendants.

---

**DECLARATION OF ANDREA CORMIER.**

COMES NOW, Andrea Cormier and pursuant to 28 U.S.C. § 1748, declares under  
penalty of perjury that the foregoing is true and correct:

1. My name is Andrea Cormier, and I am over 18 years old and have personal knowledge of the facts as stated herein.
2. I am the mother of C.A.C., my ten-year-old son.
3. C.A.C., lives with multiple disabilities including Down Syndrome, an autism spectrum disorder, a congenital heart defect and respiratory issues.
4. C.A.C. attends school in Pasco County. The school district has identified C.A.C. as a student with a disability and provided him with an Individualized Education Plan. C.A.C. is being educated on a modified curriculum also known as Access Points.
5. C.A.C.'s doctor has advised me that it is too dangerous for him to return to school in person because no one can guarantee his safety. C.A.C. is too young to be vaccinated and not medically cleared to be vaccinated.
6. No one from the district has provided me with any alternatives, options or accommodations so that C.A.C. can remain safe while still attending public school and receiving a free appropriate public education he is entitled to. There are few, if any, online programs that provide direct instruction from a certified ESE teacher for students who are on a modified curriculum.



*Declaration of Andrea Cormier*  
*Page 2 of 2*

7. I do not have the financial ability or the training to homeschool C.A.C. Thus, I am left with having to decide whether to risk C.A.C.'s life or leave the public school system and the opportunity for C.A.C. to receive a free appropriate public education.
8. I am seeking a reinstatement of a "full panoply of services" including but not limited to requirements to follow CDC guidelines including the wearing of masks in schools and live synchronous and asynchronous instruction with the same curriculum as in person instruction and the ability to interact with a student's teacher and peers equal to the options provided to nondisabled students.

FURTHER DECLARANT SAYETH NAUGHT.

*Andrea Cormier*  
\_\_\_\_\_  
Andrea Cormier

8/23/2021  
\_\_\_\_\_  
Date

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JUDITH ANNE HAYES, individually  
and on behalf of W.H., a minor, *et al.*

CASE NO: 1:21-cv-22863-KMM

Plaintiffs,

v.

GOVERNOR RONALD DION DESANTIS, in his official  
Capacity as Governor of the State of Florida; *et al.*,

Defendants.

---

**DECLARATION OF CATHERINE BONEY.**

COMES NOW, Catherine Boney and pursuant to 28 U.S.C. § 1748, declares under penalty  
of perjury that the foregoing is true and correct:

1. My name is Catherine Boney, and I am over 18 years old and have personal knowledge of the facts as stated herein.
2. I am the mother of E.B., my ten-year-old daughter.
3. E.B. is a kidney transplant recipient, hard-of-hearing, and immunocompromised. She also lives with a visual impairment, severe post-traumatic stress disorder (PTSD), and an anxiety disorder.
4. Attending school virtually gave E.B. severe depression because she was unable to access her extra support services for her mental health, however attending school in an unsafe environment is triggering to her PTSD. We have been put into an impossible situation.
5. E.B. attends a public school in Pasco County. The school district has identified E.B. as a student with a disability and has provided her with an Individualized Education Plan.
6. Their doctor has advised me that it is too dangerous for E.B. to return to school in person as no one can guarantee their safety.
7. No one from the district has provided me with any other alternatives or accommodations so that E.B. can remain safe while still attending public school and receiving a free appropriate public education as he is entitled.

*Declaration of Catherine Boney*  
*Page 2 of 2*

8. I do not have the financial ability or the training to homeschool E.B. Thus, I am left with having to decide whether to risk E.B.'s life or leave the public school system and the opportunity for E.B. to receive a free appropriate public education.
9. I am seeking a reinstatement of a "full panoply of services" including but not limited to requirements to follow CDC guidelines including the wearing of masks in schools and live synchronous and asynchronous instruction with the same curriculum as in person instruction and the ability to interact with a student's teacher and peers equal to the options provided to nondisabled students.

FURTHER DECLARANT SAYETH NAUGHT.



---

Catherine Boney

8/20/2021

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Date

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JUDITH ANNE HAYES, individually  
and on behalf of W.H., a minor, *et al.*

CASE NO: 1:21-cv-22863-KMM

Plaintiffs,

v.

GOVERNOR RONALD DION DESANTIS, in his official  
Capacity as Governor of the State of Florida; *et al.*,

Defendants.

---

**DECLARATION OF CARYN PLATT.**

COMES NOW, Caryn Platt and pursuant to 28 U.S.C. § 1748, declares under penalty of perjury that the foregoing is true and correct:

1. My name is Caryn Platt, and I am over 18 years old and have personal knowledge of the facts as stated herein.
2. I am the mother of C.B. and A.B., my ten-year-old daughters.
3. C.B. lives with a specific learning disability and a congenital heart defect.
4. A.B. lives with an anxiety disorder.
5. C.B. and A.B. attend public school in Seminole County. The school district has identified C.B. and A.B. as students with a disability. C.B. has an Individualized Education Plan. A.B. has a 504 plan.
6. Their doctor has advised me that it is too dangerous for my children to return to school in person as no one can guarantee their safety.
7. No one from the district has provided me with any other alternatives or accommodations so that C.B. and A.B. can remain safe while still attending public school and receiving appropriate and inclusive educations.
8. I do not have the financial ability or the training to homeschool my children. Thus, I am left with having to decide whether to risk their lives or leave the public school system and the opportunity for my children to receive a free appropriate public education.

*Declaration of Caryn Platt*

*Page 2 of 2*

9. I am seeking a reinstatement of a "full panoply of services" including but not limited to requirements to follow CDC guidelines including the wearing of masks in schools and live synchronous and asynchronous instruction with the same curriculum as in person instruction and the ability to interact with a student's teacher and peers equal to the options provided to nondisabled students.

FURTHER DECLARANT SAYETH NAUGHT.

Caryn Platt  
Caryn Platt

8/20/21  
Date



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JUDITH ANNE HAYES, individually  
and on behalf of W.H., a minor, *et al.*

CASE NO: 1:21-cv-22863-KMM

Plaintiffs,

v.

GOVERNOR RONALD DION DESANTIS, in his official  
Capacity as Governor of the State of Florida; *et al.*,

Defendants.

**DECLARATION OF JENNIFER WEST**

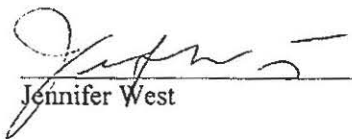
COMES NOW, Jennifer West and pursuant to 28 U.S.C. § 1748, declares under penalty  
of perjury that the foregoing is true and correct:

1. My name is Jennifer West, and I am over 18 years old and have personal knowledge of the facts as stated herein.
2. I am the mother of L.W.-Q., my nine-year-old son.
3. L.W.-Q. lives with an autism spectrum disorder.
4. L.W.-Q. attends school in Seminole County. The school district has identified L.W.-Q. as a student with a disability and provided an Individualized Education Plan. L.W.-Q. is educated in a self-contained special education classroom with certified special education teachers throughout the school day.
5. L.W.-Q.'s doctor has advised me that it is too dangerous for L.W.-Q. to return to school in person at this time because no one can guarantee his safety.
6. No one from the district has provided me with any alternatives, options or accommodations so that L.W.-Q. can remain safe while still attending public school and receiving a free appropriate public education. The district has suggested L.W.-Q. enroll in virtual school however, no online programs provide direct instruction with a certified special education teacher or all the supports and services he is entitled to throughout the school day. No online option suggested would provide L.W.-Q. with FAPE in the LRE.

*Declaration of Jennifer West*  
*Page 2 of 2*

7. I do not have the financial ability or the training to homeschool L.W.-Q. Thus, I am left with having to decide whether to risk L.W.-Q.'s life or leave the public school system and the opportunity for L.W.-Q. to receive a free appropriate public education.
8. I am seeking a reinstatement of a "full panoply of services" including but not limited to requirements to follow CDC guidelines including the wearing of masks in schools and live synchronous and asynchronous instruction with the same curriculum as in person instruction and the ability to interact with a student's teacher and peers equal to the options provided to nondisabled students.

FURTHER DECLARANT SAYETH NAUGHT.

  
Jennifer West

Date 8/22/21

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JUDITH ANNE HAYES, individually  
and on behalf of W.H., a minor, *et al.*

CASE NO: 1:21-cv-22863-KMM

Plaintiffs,

v.

GOVERNOR RONALD DION DESANTIS, in his official  
Capacity as Governor of the State of Florida; *et al.*,

Defendants.

---

**DECLARATION OF KATHRYN ESTRADA.**

COMES NOW, Kathryn Estrada and pursuant to 28 U.S.C. § 1748, declares under penalty of perjury that the foregoing is true and correct:

1. My name is Kathryn Estrada, and I am over 18 years old and have personal knowledge of the facts as stated herein.
2. I am the mother of Z.E., my four-year-old daughter.
3. Z.E. lives with chronic lung disease, a congenital heart defect, and developmental delays. She relies on a feeding tube.
4. Z.E. attends public school in St. Johns County. The school district has identified Z.E. as a student with a disability and she has been provided with an Individualized Education Plan.
5. Z.E.'s doctor has advised me that it is too dangerous for her to return to school in person because no one can guarantee her safety.
6. No one from the district has provided me with any options or accommodations so that Z.E. can remain safe while still attending public school and receiving a free appropriate public education as she is entitled.
7. I do not have the financial ability or the training to homeschool Z.E. Thus, I am left with having to decide whether to risk Z.E.'s life or leave the public school system and the opportunity for Z.E. to receive a free appropriate public education.
8. I am seeking a reinstatement of a "full panoply of services" including but not limited to requirements to follow CDC guidelines including the wearing of masks in schools and live synchronous and asynchronous instruction with the same curriculum as in person

*Declaration of Kathryn Estrada*  
*Page 2 of 2*

instruction and the ability to interact with a student's teacher and peers equal to the options provided to nondisabled students.

FURTHER DECLARANT SAYETH NAUGHT.

  
Kathryn Estrada

  
Date

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JUDITH ANNE HAYES, individually  
and on behalf of W.H., a minor, *et al.*

CASE NO: 1:21-cv-22863-KMM

Plaintiffs,

v.

GOVERNOR RONALD DION DESANTIS, in his official  
Capacity as Governor of the State of Florida; *et al.*,

Defendants.

---

**DECLARATION OF ADRIENNE ANDINO.**

COMES NOW, Adrienne Andino and pursuant to 28 U.S.C. § 1748, declares under penalty of perjury that the foregoing is true and correct:

1. My name is Adrienne Andino, and I am over 18 years old and have personal knowledge of the facts as stated herein.
2. I am the mother of D.A., my seven-year-old son.
3. D.A. lives with an autism spectrum disorder and apraxia.
4. D.A. attends public school in Volusia County. The school district has identified D.A. as a student with a disability and provided him with an Individualized Education Plan. D.A. receives direct instruction from certified ESE teachers through the school day.
5. I am a nurse and because of my knowledge in the medical field, I believe it is too dangerous for him to return to school in person because no one can guarantee his safety.
6. No one from the district has provided me with any alternatives, options or accommodations so that D.A. can remain safe while still attending public school and receiving an appropriate and inclusive education.
7. I do not have the financial ability or the training to homeschool D.A. Thus, I am left with having to decide whether to risk D.A.'s life or leave the public school system and the opportunity for D.A. to receive a free appropriate public education.



*Declaration of Adrienne Andino*

*Page 2 of 2*

8. I am seeking a reinstatement of a “full panoply of services” including but not limited to requirements to follow CDC guidelines including the wearing of masks in schools and live synchronous and asynchronous instruction with the same curriculum as in person instruction and the ability to interact with a student’s teacher and peers equal to the options provided to nondisabled students.

FURTHER DECLARANT SAYETH NAUGHT.



Adrienne Andino

08/20/2021

Date