

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

C.P., individually and on behalf of F.P., a minor child; D.O. individually and on behalf of M.O., a minor child; S.B.C., individually and on behalf of C.C., a minor child; A.S., individually and on behalf of A.A.S., a minor child; M.S., individually and on behalf of her minor child, H.S.; Y.H.S., individually and on behalf of his minor child, C.H.S.; E.M. on behalf of her minor child, C.M.; M.M., individually and on behalf of K.M.; L.G., individually and on behalf of her minor child, T.M.; E.P., individually and on behalf of her minor child, Ea.P.; and on behalf of ALL OTHERS SIMILARLY SITUATED,

Plaintiffs,

v.

NEW JERSEY DEPARTMENT OF EDUCATION; ANGELICA ALLEN-McMILLAN, Acting Commissioner of Education, in her official capacity,  
Defendants.

Civil Action No. 19-cv-12807-NLH-MJS

Noel L. Hillman, U.S.D.J.

Matthew J. Skahill, U.S.M.J.

**DECLARATION OF JENNIFER N.  
ROSEN VALVERDE REGARDING  
PLAINTIFFS' MOTION FOR  
PRELIMINARY APPROVAL OF  
SETTLEMENT AGREEMENT**

I, Jennifer N. Rosen Valverde, hereby declare:

1. I am an attorney licensed to practice law in the State of New Jersey, and I am admitted to the United States District Court for the District of New Jersey. My firm, the Education and Health Law Clinic at Rutgers University

School of Law, represents *Amici Curiae* in this matter. I make this declaration based upon my personal knowledge. If called to testify, I could testify competently to the facts in this declaration.

2. On June 23, 2023, as counsel for *Amici Curiae*, I wrote to the Court raising concerns with the Settlement Agreement submitted for preliminary approval on June 9, 2023. ECF No. 464.

3. During the fall of 2023, as counsel for *Amici Curiae*, I was involved in the negotiations to revise the Settlement Agreement to address the concerns raised in ECF No. 464.

4. Class Counsel also consulted me, as counsel for *Amici Curiae*, in drafting the proposed Notice.

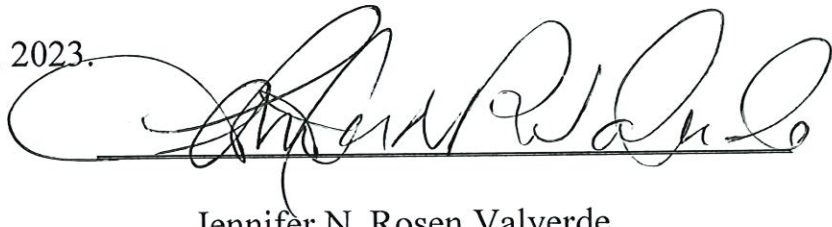
5. The clients I represent will not be raising objections to the revised Settlement Agreement.

6. One of my clients, New Jersey Special Education Practitioners (NJSEP), is comprised of individual attorneys and advocates within the State of New Jersey. Because the revised Agreement has not been signed, I have not yet shared it with the individual members of NJSEP; however, the designated representative of NJSEP has reviewed and approved the Agreement. I cannot represent to the Court whether any member of NJSEP, in his or her individual capacity, will have concerns about the Agreement. However, I would not be able to

represent any individual NJSEP member who did have a concern because my clients support the Settlement Agreement.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 8, 2023.

A handwritten signature in black ink, appearing to read "Jennifer N. Rosen Valverde", is written over a horizontal line. The signature is highly stylized and cursive.

Jennifer N. Rosen Valverde