

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

RUTHELLE FRANK, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

SCOTT WALKER, in his official capacity as
Governor of the State of Wisconsin, et al.,

Defendants.

Civil Action No. 2:11-cv-01128 (LA)

DECLARATION OF SEAN J. YOUNG

I, Sean J. Young, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am one of the attorneys for the Plaintiffs in the above-captioned action. I submit this Declaration in support of Plaintiffs' Memorandum in Opposition to Defendants' Civil L.R. 7(h) Expedited Non-Dispositive Motion to Compel the Production of Un-redacted Survey Data.

2. Attached as Exhibit A hereto is a true and correct copy of the Federal Judicial Center's Reference Guide on Survey Research by Shari Seidman Diamond, which is part of the larger Reference Manual on Scientific Evidence, Third Edition, located on the Federal Judicial Center website. A copy of the Guide may be found at [http://www.fjc.gov/public/pdf.nsf/lookup/SciMan3D09.pdf/\\$file/SciMan3D09.pdf](http://www.fjc.gov/public/pdf.nsf/lookup/SciMan3D09.pdf/$file/SciMan3D09.pdf) (last visited Sept. 25, 2013).

3. Attached as Exhibit B hereto is a true and correct copy of the American Association for Public Opinion Research Code of Professional Ethics and Practices (revised May

2010), which may be found by clicking the “Download PDF” link found at
http://www.aapor.org/AAPOR_Code_of_Ethics/4249.htm (last visited Sept. 25, 2013).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 25, 2013.

/s/ Sean J. Young
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