

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

HAZEL MCMILLON; et al.,  
Plaintiffs,

vs.

STATE OF HAWAII; et al.,  
Defendants.

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STATE OF HAWAII; et al.,

Third-Party Plaintiffs,

vs.

URBAN MANAGEMENT  
CORPORATION DBA URBAN  
REAL ESTATE COMPANY, et al.,

Third-Party  
Defendants.

CIVIL NO. CV 08-00578 LEK  
Civil Rights Action  
Class Action

**DECLARATION OF VICTOR  
GEMINIANI**

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Pursuant to 28 U.S.C. § 1746, I declare that:

1. I am an attorney with Lawyers for Equal Justice (“LEJ”),  
counsel for Plaintiffs and the class herein.

2. I make this declaration based on my personal knowledge and  
am competent to testify as to the matters set forth herein.

3. The settlement in this action was reached after more than a year of settlement discussions and after multiple sessions with Magistrate Judge Leslie Kobayashi and mediator Keith Hunter. Plaintiffs' counsel has determined that this settlement is fair, reasonable, and in the best interests of the class.

4. LEJ has incurred \$373,055 in attorneys' fees and \$7,053.77 in expenses in this action and in *McMillon v. State of Hawaii*, Civil No. 08-1-2608-12, in the Circuit Court of the First Circuit for the State of Hawai'i.

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

Executed in Honolulu, Hawai'i on October 26, 2010.

/s/ Victor Geminiani  
VICTOR GEMINIANI