

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**JANE DOE, JANE DOE 2, JANE DOE 3,
JANE DOE 4, JANE DOE 5, JANE DOE 6,
JANE DOE 7, and JANE DOE 8**, individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

CHARLES D. BAKER, Governor of the
Commonwealth of Massachusetts;
**MASSACHUSETTS DEPARTMENT OF
CORRECTION; THOMAS TURCO**,
Commissioner of the Massachusetts
Department of Correction; and **PAUL
HENDERSON**, Superintendent of the
Massachusetts Correctional Institution at
Framingham,

Defendants.

Civil Action No. 1:14-cv-12813-DPW

**AFFIDAVIT OF LISA J. PIROZZOLO IN SUPPORT OF PLAINTIFFS'
RESPONSE TO DEFENDANTS' MOTION TO DISMISS**

I, Lisa J. Pirozzolo, hereby depose and state as follows:

1. I submit this affidavit pursuant to 28 U.S.C. § 1746 in support of Plaintiffs' response to the motion to dismiss the above-captioned lawsuit.
2. The statements set forth in this affidavit are based on my own personal knowledge and investigation unless stated otherwise. These statements are true to the best of my knowledge and belief as of the date I sign this affidavit.
3. I am a partner at the law firm of Wilmer Cutler Pickering Hale and Dorr LLP, and counsel for Plaintiffs in the above-captioned action. I am licensed to practice law in the Commonwealth of Massachusetts, and I am admitted to practice before the

U.S. District Court for the District of Massachusetts.

4. Attached to this Affidavit as Exhibit A is a true and correct copy of 2016 Mass. Acts ch. 8, sec. 4.

5. Attached to this Affidavit as Exhibit B is a true and correct copy of a Letter from Assistant Attorney General Douglas H. Wilkins to Steven J. Schwartz, Esq. (Sept. 10, 1992), and the enclosed Letter from DPH Commissioner David Mulligan to Rep. Barbara Gray (July 1, 1992).

6. Attached to this Affidavit as Exhibit C is a true and correct copy of Section 35 “Fast Stats” (Apr. 15, 2016 & May 6, 2016).

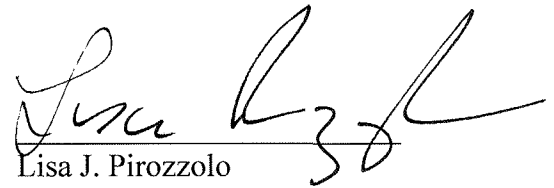
7. Attached to this Affidavit as Exhibit D is a true and correct copy of Memorandum of Understanding Between Massachusetts Department of Correction and the Plymouth County Sheriff’s Department (Feb. 16, 2016).

8. Attached to this Affidavit as Exhibit E is a true and correct copy of pages 5 and 6 of Commonwealth of Massachusetts Department of Correction Advisory Council, Final Report (Oct. 25, 2005).

9. Attached to this Affidavit as Exhibit F is a true and correct copy of “Moving Beyond Prisons: Creating Alternative Pathways for Women.” Wellesley Centers for Women, Massachusetts Women’s Justice Network (2012-13).

10. Attached to this Affidavit as Exhibit G is a true and correct copy of pages 77 and 78 of Analysis of Health Care Costs in the MA Department of Correction, MGT of America, Final Report (Dec. 2011).

I declare under the penalty of perjury that the foregoing statements are true and correct to the best of my knowledge and belief as of May 16, 2016.



Lisa J. Pirozzolo