

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

NATIONAL VETERANS LEGAL  
SERVICES PROGRAM, et al.

*Plaintiffs,*

v.

UNITED STATES OF AMERICA,

*Defendant.*

Case No. 16-745

**DECLARATION OF RAKIM BROOKS**

I, Rakim Brooks, declare as follows:

1. I am the President of Alliance for Justice, a national alliance of approximately 150 public-interest member organizations that share a commitment to an equitable, just, and free society. Among other things, AFJ works to ensure that the federal judiciary advances core constitutional values and preserves unfettered access to justice for all Americans. I previously served as Campaign Manager for the ACLU's Systemic Equality Campaign and as an associate attorney at Susman Godfrey. I was also a member of the Biden-Harris Transition Team and previously served as a policy advisor for the U.S. Department of the Treasury during the Obama administration. I hold an A.B. from Brown University; an M.Phil in Politics from the University of Oxford, where I was a Rhodes Scholar; and a J.D. and M.B.A. from Yale Law School and the Yale School of Management. I clerked for Justice Edwin Cameron on the Constitutional Court of South Africa and on the U.S. Court of Appeals for the Ninth Circuit and the D.C. Circuit.

2. AFJ has served as a named plaintiff in this class action since its filing in April 2016, a period of more than seven years. For much of that time period, until his departure for a position at the U.S. Senate last year, AFJ's Legal Director Daniel Goldberg oversaw this litigation on AFJ's behalf. Among other things, Mr. Goldberg received updates on

motion practice and court rulings from class counsel, reviewed draft pleadings, consulted on strategy, and provided a declaration in support of class certification on AFJ's behalf. I understand that counsel will seek a service award for AFJ of \$10,000. Although our organization did not keep formal time records, it is reasonable to estimate that the value of the attorney time incurred by AFJ over the seven-year life of this case exceeds that amount when calculated at market rates.

3. AFJ supports the proposed class-action settlement and accompanying request for fees, costs, and service awards. Almost by definition, this was a difficult, risky, and ambitious case: a first-ever nationwide class action for monetary relief against the federal judiciary. AFJ would never have decided to sue the federal judiciary lightly. But class counsel were equal to the task and the tenacity and litigation skill they displayed were impressive. Through this seven-year litigation battle, the plaintiffs and class counsel decreased barriers to information about the judicial system, brought information about the PACER paywall to light, spurred ongoing legislative action, created a blueprint for holding the judiciary accountable through litigation, and delivered a landmark monetary settlement to which AFJ is proud to have contributed.

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

Executed on August 17, 2023.

/s/ Rakim Brooks  
Rakim Brooks