

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA

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BEATRICE B. McWATERS; FLORENCE :
JACKSON; CALVIN DAVIS; REGINALD :
JONES; VAN PATIN; JOHN HUBBARD; :
BILLY SMITH; THURMOND PRICE; KEIVA :
MELISSA COLOMB; RUSSELL HAYWARD; :
MARY PAT VAN TINO; PAMELA JACKSON; :
WILLIAM DAVIS; ELIZABETH SIMPSON; :
CHRIS DAVIS; LYMAN SCOTT; MICHELLE :
DAVIS; JENNIFER SAMPEY; DAVID MAGEE; :
KEISHAN GOODMAN; SHAWN ALLEN; :
TIMOTHY HOOD; MICHAEL MARTINEZ; :
CHARLES HILL, JR.; and LENORA BARTLEY; :
On Behalf Of Themselves And All Those Similarly :
Situating, :

Civ. No.: 05 - 5488 (SRD)

Plaintiffs,

- against -

FEDERAL EMERGENCY MANAGEMENT :
AGENCY; DEPARTMENT OF HOMELAND :
SECURITY; MICHAEL CHERTOFF, Secretary :
of Department of Homeland Security; DAVID :
PAULISON, Interim Director, Federal :
Emergency Management Agency; THAD W. :
ALLEN, Principal Federal Official, Federal :
Emergency Management Agency; KENNETH O. :
BURRIS, JR., Regional Director, Federal :
Emergency Management Agency; RON :
CASTLEMAN, Regional Director, Federal :
Emergency Management Agency; RON :
SHERMAN, Federal Coordinating Officer, :
Federal Emergency Management Agency; :
WILLIAM CARWILE, Federal Coordinating :
Officer, Federal Emergency Management :
Agency; BILL LOCKEY, Federal Coordinating :
Officer, Federal Emergency Management :
Agency; and their successors in office, :

Defendants.

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DECLARATION OF LENORA BARTLEY

10041799.1

I, Lenora Bartley, state as follows:

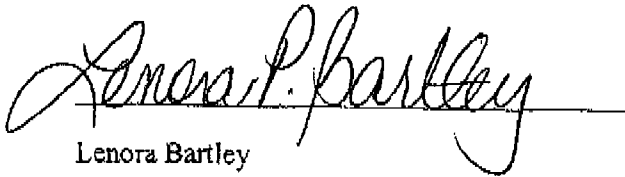
1. I was a resident of Gretna, Louisiana at the time Hurricane Katrina struck. I evacuated from the storm with my eight-year old son. I registered with FEMA approximately one to two weeks after the storm. After traveling throughout Louisiana and Texas, we eventually ended up living in a motel in San Antonio, Texas. We have been living in the motel for over two months.
2. I have found an apartment complex for myself and my eight-year old son, which will accept us, but cannot move there without housing assistance from FEMA.
3. On December 26, 2005, I received two letters from FEMA stating that I was ineligible for housing assistance because a member of my household was already provided with housing assistance.
4. On January 6, 2006, on a FEMA representative explained to me over the phone that I had been denied housing assistance because my husband had already received housing assistance. I explained that my husband and I were separated and that I was still in need of housing assistance. She told me that I would be receiving a letter in the mail which would explain why I had been denied benefits and that I would have to fill out a form explaining why my husband and I were separated. I have not yet received this letter.
5. On January 10, 2006, I received a call from the motel I am staying in explaining a notice they received from FEMA, stating that I need to register with FEMA or they will stop paying for my hotel room as of February 7, 2006.
6. On information and belief, my brother, who was staying in the same motel as me, has received housing assistance in late December. A DRC worker told him that

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because he had received the housing assistance, he had to move out of the motel by January 10, 2006. My brother has secured an apartment, but had been trying to get some basic necessities, such as a bed, prior to leaving the motel and moving into the apartment. However, based on the information provided by the DRC worker, my brother has moved out of the motel prior to obtaining such necessities.

In accordance with 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing statements are true and correct.

Signed 10 day of January 2006.


Lenora Bartley