

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MAINE  
PORTLAND DIVISION

DANIEL B. LOCKE; *et al.*, ON BEHALF OF  
THEMSELVES AND THE CLASS THEY SEEK  
TO REPRESENT,

Plaintiffs,

v.

EDWARD A. KARASS, STATE CONTROLLER, *et  
al.*,

Defendants.

CASE NO. 2:05-cv-00112-GZS

**DECLARATION OF ROGER M.  
DROLET IN SUPPORT OF  
PLAINTIFFS' MOTION FOR CLASS  
CERTIFICATION**

ROGER M. DROLET, pursuant to Section 1746 of the Judicial Code, 28 U.S.C. §1746,  
declares as follows:

1. I have first hand knowledge of all of the facts set forth herein, and if called to  
testify could do so competently.

2. I am an employee of the State of Maine, employed by the Maine State Police,  
Management Information Systems. My designation is Information Systems Support Specialist I.  
I am employed in a bargaining unit represented, exclusively for purposes of collective  
bargaining, by the Maine State Employees Association, Local 1989, Service Employees  
International Union, AFL-CIO-CLC ("MSEA"), Defendant herein.

3. On or after 11 April 2005, I received from Defendant MSEA a number of  
documents, including: (1) a two-page memorandum; (2) a four-page, 11" x 17" tabloid-style

document on newsprint identified as the “Notice of Rights Concerning MSEA-SEIU Membership, Dues and Fees”; and (3) a dues checkoff authorization card.

4. When I initially received MSEA’s notice, I filled out the blue, dues checkoff authorization and union membership card before I became aware that MSEA’s notice and procedures might violate my rights.

5. Since that time, I have learned of the pendency of this lawsuit. In mid-July, I met counsel for Plaintiffs, and based upon the pendency of this lawsuit, I contacted the right people and had them cancel the card. I revoked my authorization for any pay roll deduction and according to Mary Labbe.

6. Had I known that this lawsuit was proceeding, and that MSEA is alleged to have violated the rights of nonmembers who received its notice, I would not have joined the union, nor would I have authorized dues deductions from my wages, in the first place. I consider myself a member of the class of individuals that Plaintiffs seek to represent, and request that the class be certified.

I have read the foregoing, and state under penalty of perjury and upon my knowledge, information, and belief that the statements contained herein are true and correct.

Executed on 25 July 2005.

/s/ Roger M. Drolet

ROGER M. DROLET

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Monday, 1 August 2005, 12:18:02 pm, E.D.T.