

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF LEXINGTON )  
 )  
 GEORGE BOSKIE, HADEL TOMA and )  
 TERRY KELLER, )  
 )  
 Plaintiffs, )  
 )  
 v. )  
 )  
 BACKGROUNDCHECKS.COM, LLC )  
 )  
 Defendant. )

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IN THE COURT OF COMMON PLEAS  
 ELEVENTH JUDICIAL CIRCUIT  
 CASE NO. 2019CP3200824

**DECLARATION OF TERRY KELLER IN  
 SUPPORT OF PLAINTIFFS' MOTION  
 FOR ATTORNEYS' FEES, COSTS, AND  
 CLASS REPRESENTATIVE SERVICE  
 AWARDS**


I, Terry Keller, hereby declare as follows:

1. The following statements are true to the best of my knowledge and belief.
2. I am one of the Named Plaintiffs and Class Representatives in this case. I submit this Declaration in support of Plaintiffs' Motion for Attorneys' Fees, Costs, and Class Representative Service Award.
3. I brought this case because I wanted to see changes in how criminal record information was reported. I agreed to serve as a Named Plaintiff and Class Representative even though I knew that my offense history would be publicly disclosed in this case.
4. I take my role as a Named Plaintiff and Class Representative seriously, and have put the interests of the class members first when making all decisions in this case.
5. I helped my attorneys investigate the claims in this case, and reviewed and approved the complaint before it was filed. I gathered documents for the case and responded to interrogatories and requests for production of documents.
6. I have remained informed about the status and progress of the case, and have had many conversations with my attorneys regarding the status and direction of the case.

7. Even though the case resolved, I was committed to sitting for my deposition, testifying at trial, and doing whatever else was required of me in order to ensure a successful outcome for the class in this case.

8. I talked with my attorneys throughout the settlement discussions in this case. I reviewed and signed the settlement agreement, and I fully support the settlement.

Date: 8/15/2019

DocuSigned by:  
  
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Terry Keller