

# Exhibit 3

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Civil Action No. 14-cv-03111-CMA-KLM

JULIE REISKIN, et al., on behalf of herself and others similarly situated,

Plaintiffs,

v.

REGIONAL TRANSPORTATION DISTRICT, a political subdivision of the State of  
Colorado,

Defendant.

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**DECLARATION OF ANDREW C. MONTOYA IN SUPPORT OF PLAINTIFFS'  
UNOPPOSED MOTION OF A CLASS CERTIFICATION FOR SETTLEMENT PURPOSES  
ONLY AND PRELIMINARY APPROVAL OF CLASS SETTLEMENT AGREEMENT**

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I, Andrew C. Montoya, declare as follows:

1. I am over eighteen years of age, am familiar with the facts stated below based on my own personal knowledge, and if called upon could and would testify competently about them.

2. I make this declaration in support of Plaintiffs' Unopposed Motion of a Class Certification for Settlement Purposes Only and Preliminary Approval of Class Settlement Agreement.

3. I am an attorney in good standing of the State Bar of Colorado, and I am an Associate Attorney with the Colorado Cross-Disability Coalition ("CCDC"), a position I have held for the last six years after working for CCDC as its Legal Program Assistant for a year and a half before going to law school. I then worked as an Assistant for the

Legal Program for one year while in law school, taking the bar exam and prior to being sworn in an attorney in Colorado. I am counsel for Plaintiffs in this action.

4. For the last six years, I have litigated nothing but disability rights cases. These are the only types of cases I have litigated during that timeframe.

5. I have litigated the following case in which I was appointed class counsel: *CCDC, et al. v. Abercrombie & Fitch Co., et al.*, 09-cv-02757-WYD-KMT (U.S. Dist. Ct. of Colo. 2009).

6. I have worked for six years for CCDC as an attorney, and two and a half years in other capacities in the Legal Program as explained. CCDC has as its mission: "CCDC advocates for social justice for people with all types of disabilities." See CCDC Mission on website: <http://ccdconline.org/about/mission> (last accessed September 13, 2016).

7. The case I have litigated in which I have been appointed class counsel has never resulted in any conflict of any kind.

8. Based on my experience litigating disability rights lawsuits, I believe this Class Action Settlement Agreement is fair and reasonable.

9. I declare under penalty of perjury that the foregoing is true and correct.

Further the Declarant says nothing.

Executed on November 14, 2016.

/s/ Andrew C. Montoya  
Andrew C. Montoya

*Attorney for Plaintiffs*