

# EXHIBIT PX-24

**IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF PENNSYLVANIA**

WHITEWOOD *et al.*,

Plaintiffs,

v.

WOLF *et al.*,

Defendants.

**Civil Action**

**No. 13-1861-JEJ**

**DECLARATION OF GREGORY WRIGHT**

I, Gregory Wright, declare as follows:

1. I am 57 years old and live in State College, Pennsylvania with my husband Ron Gebhardtshauer. I am a licensed acupuncturist and operate a private practice.

2. I submit this declaration in support of Plaintiffs' Motion for Summary Judgment in the matter of *Whitewood et al. v. Wolf et al.* to briefly describe why I want the Commonwealth to recognize my marriage to Ron, my partner of 19 years, and to explain how the Commonwealth of Pennsylvania's refusal to recognize our marriage harms both of us.

3. Ron and I moved to State College in 2008, when Ron took a job teaching at Penn State University. We are active members of our community and of the University Baptist & Brethren Church.

4. When it became possible to do so in 2011, we registered as domestic partners in State College. A true and correct copy of our domestic partnership certificate with a press photograph of the ceremony, produced in this litigation as GEBHARDTWRIGHT00006, are attached as Exhibit PX-24-A. We have long wanted to get married to publicly declare our love and commitment to each other. The term “partner” does not adequately convey our love for each other or the level of commitment we have made to each other.

5. I want to spend the rest of my life with Ron. He is a man of integrity, and I am inspired by him every single day. He strives to see the best in people and makes me want to be the best I can be.

6. We had hoped to marry in State College where our friends and community are located. The pastor of our church had agreed to officiate at our wedding if marriage in Pennsylvania became a possibility. A true and correct copy of an article from the Daily Collegian discussing our plans, produced in this litigation as GEBHARDTWRIGHT00001, is attached as Exhibit PX-24-B.

7. When the United States Supreme Court struck down the federal Defense of Marriage Act, that meant for the first time that, if we were to marry outside of Pennsylvania, the federal government would recognize our marriage (at least for some purposes) even if Pennsylvania would not. Because we had long wanted to be recognized as married, we decided to get married outside of

Pennsylvania even though we knew that our marriage would not be recognized once we returned home.

8. On November 27, 2013, while visiting family in Maryland for Thanksgiving, we got married in a small civil ceremony in Rockville, Maryland. A true and correct copy of our marriage license, produced in this litigation as GEBHARDTWRIGHT00008, is attached as Exhibit PX-24-C. A true and correct copy of a photograph of us at the ceremony, produced in this litigation as GEBHARDTWRIGHT00669, is attached as Exhibit PX-24-D.

9. We would have preferred to be married in our own church and with our wider community, but because it was important to us, after 19 years together, to finally have our love and commitment officially recognized, and because Ron's mother, who is 90 years old, and his sister and brother were excited to stand with us at our ceremony, we decided to get married now rather than wait for some uncertain date in the future when Pennsylvania law might change.

10. This year, because our marriage is recognized by the federal government, we have filed joint income taxes for the first time. Unfortunately, because Pennsylvania does not recognize our marriage, we had to file our state returns separately. This means we essentially had to do our taxes twice – once jointly for the federal government and once separately for Pennsylvania.

11. In addition, when we filed our state returns, we each had to identify ourselves as single even though we are now married.

12. Because Pennsylvania does not allow us to marry and will not recognize our Maryland marriage, we have gone to considerable expense to have an attorney prepare wills, health care powers of attorney, and financial powers of attorney, to try to replicate some of the protections that married couples have by default. For the same reason, we own our homes as joint tenants with right of survivorship. Though these documents allow us to approximate some of the protections of marriage, there are many others we would have if we were married that the documents cannot provide.

13. I also worry that, if one of us were to have a medical emergency, we might not have our healthcare powers of attorney available or they might not be respected. If our marriage were recognized, our relationship would simply be recognized without the need for special documentation.

14. I also worry that, when one of us dies, the other will have to pay a 15% inheritance tax on the entire estate. Again, if our marriage were recognized, we would not have this added expense. If Ron were to die first, paying the inheritance tax would create significant financial difficulties for me.

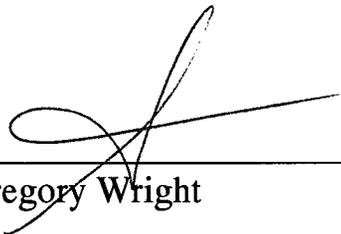
15. If Ron or I were to die in Pennsylvania, where we live, I would want our death certificates to reflect that we are married to each other. Because

Pennsylvania does not recognize our marriage, however, I would not be listed as Ron's surviving spouse on his death certificate (or he on mine) even though we have lived together for 19 years and even though we are now married.

16. I make this declaration from my own knowledge of the facts and circumstances set forth above. If necessary, I could and would testify to these facts and circumstances.

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

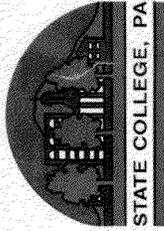
Executed on: April 15, 2014



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Gregory Wright

# EXHIBIT PX-24-A



# Domestic Partnership Registry

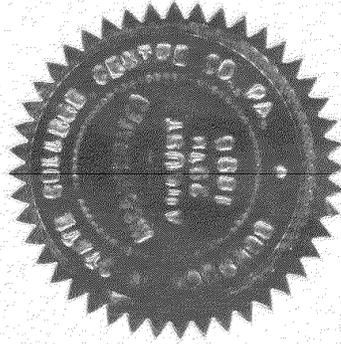


This Certificate Recognizes the Domestic Partnership Between

**Ron Gebhardt**sbauer  
&  
**Gregory L. Wright**



in the Borough of State College



*Sharon K. Engler*

Sharon K. Engler, Assistant Borough Secretary

October 1, 2011

Date

# LOCAL & STATE

## STATE COLLEGE



CDT photos/Abby Drey

State College Mayor Elizabeth Goreham signs documents Saturday for Ron Gebhardtshauer and Greg Wright to be part of the borough's domestic partnership registry at the newly dedicated Mayor Welch Plaza outside the municipal building. Wright said he and Gebhardtshauer have been together for 17 years and are happy to live in a town that offers the domestic partnership registry.

# EXHIBIT PX-24-B

SPORTS

### Men's basketball

Tim Frazier was cleared to return to the court after his injury. | Page 8



LOCAL

### Crime rates

Local police saw a crime decrease for this year's Central Pa. Arts Festival compared to 2012. | Page 3

# The Daily COLLEGLIAN

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Tuesday, July 16, 2013

30¢ off campus

## Couple fights to end SSM ban

BY SAM JAMESCH  
COLLEGLIAN NEWS EDITOR

Ron Gebhardtbauer tapped the silver band on the ring finger of his left hand lightly on his kitchen table as he spoke of the wedding he wishes he could have. His fiancé, Greg Wright, sat beside him, as Ron couldn't help but say three times in a half hour how "madly in love" he was with Greg.

But despite the vows they've made to each other, the commitment and the 19 years of unwavering devotion, Ron and Greg cannot get married — at least not here. Not in the college town where they've settled down, where Ron bikes to work at the university and where Greg runs his acupuncture business.

And despite their pastor's willingness to marry them, they're waiting on more than just the official church approval. They're waiting on the amendment of what many call



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an outdated law.

Some of their friends have  
crossed state lines to say their  
vows, but for the State College  
couple, it's simple: they won't  
perform the sacred event  
anywhere other than here.

#### Filing suit

Gebhardtshauer and Wright  
are one of 10 Pennsylvania  
same-sex couples, and 23 total  
individuals, listed as plaintiffs in  
a lawsuit filed by the American  
Civil Liberties Union last week  
to end the commonwealth's ban  
on same-sex marriage.

Filed against Gov. Tom  
Corbett, Attorney General  
Kathleen Kane and other state  
officials, the suit puts a personal  
spin on the issue and seeks to  
both allow same-sex marriages  
in the commonwealth and allow  
marriages from other states to  
be recognized within state lines.

Within two days of the  
filing, the liberal Kane already  
announced her opposition  
to the commonwealth's  
"unconstitutional" law



John Baranowski/Collegeian

**Penn State professor Ron Gebhardtshauer, right, and his partner, Greg Wright, pose for a picture outside of Saint's Cafe, 123 W. Beaver Ave. currently in place.**

Gebhardtshauer, a professor  
of actuarial science at Penn  
State and head of the actuarial  
science department, said he  
didn't realize the lawsuit would  
make national news, but he feels  
that it's the right thing to do.

"It feels really good because  
I'm going back to 30 years ago  
when I couldn't even speak the  
word, and now I feel like if this  
helps us and everybody else that  
wants to get married in the state  
of Pennsylvania that can't, this

is a wonderful thing," Wright  
said. "It's a chance to be part of  
something greater. It's scary. It's  
awesome."

Coming out and finding love  
As they sat at their kitchen  
table in a quiet neighborhood  
past the Penn State Golf  
Courses, Gebhardtshauer  
scouted his chair just a  
little closer to Wright, putting  
his hand gently on Greg's  
back as his fiancé spoke about  
"coming out in a culture where

And even then, it was  
something he kept a secret for  
a long time — until a graduate  
student psychologist he was  
seeing helped him with the  
coming out process.

Gebhardtshauer grew up in  
Newark, Del., and moved to

Allentown, Pa., in high school,  
attended Penn State in the early  
70s and said he didn't realize he  
was gay at the time.

"I didn't come out until 1979  
when I was 27," he said. "Back  
then, it took a lot longer for  
people to figure it out, because  
you would never see the word  
gay or homosexual in the  
newspaper. But like Greg, I knew  
I was different. It took a while to  
sort of figure out what that was."

See SSM, Page 2.

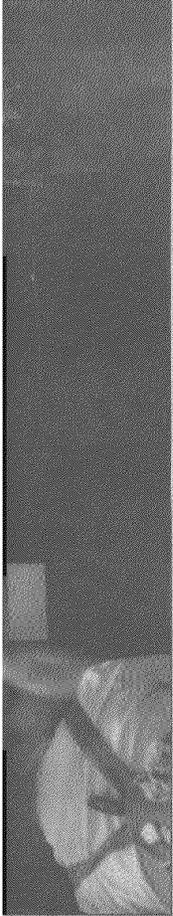
# Displaced

# Bassnectar to DJ at BJC

release. Shawley was sentenced to serve one year and seven months to four years and nine months, as well as pay a restitution fee of \$2,700 for bone marrow testing on the cattle to see if they had been starved, according to the release.

## Man sentenced on counts of sex crimes

A Howard man was sentenced Monday to nine to 23 years in prison after being convicted in April on multiple counts of dissemination of obscene materials to minors, as well as other counts, according to a press release issued by the Centre County District



John Baranowski/Collegian  
**Cristena Perez, of Danville, reads to Caroline Wolfe and Jenne Cole outside the Theater Building as part of their Honors Music Instruction class on Monday.**

Attorney's Office. Daniel Hanley, 44, was convicted on three counts of dissemination of obscene materials to minors, 21 counts of indecent assault on a person less than 16 years old, two counts of indecent assault of a person less than 13 years old and nine total counts of corruption

at trial that Hanley twice showed her videos of adults having sex, which Hanley said at trial was accidental, according to the release.

Hanley also sent the people he abused pictures of himself naked, as well as touched their breasts and buttocks, according to the release.

## 'The Crucible'

July 19-20, July 26-27  
The State Theatre,  
130 W. College Ave.  
The State College Community Theatre will perform the Arthur Miller play, "The Crucible," which spotlights the Salem Witch Trials and won a 1953 Tony Award for Best Play.

## WingFest

Every Thursday starting July 18, 5:30 p.m.

Tussey Mountain Admission is \$5 with free parking. Tickets for wings cost \$1 each, where each ticket can be exchanged for two wings. Local restaurants' wing flavors compete each week for the attendees' votes to move on to the finals on Aug. 29.

# Local couple fights to end Pa. SSM ban

SSM, From Page 1.

Now, 19 years after running into each other in the streets of Washington, D.C., the couple is engaged and "finally in a place we can actually announce our love for each other," Wright said.

While the minister of their church has not made an official decision, Gebhardtshauer said their pastor said she would be happy to marry them and is starting to talk to the minister in hopes that one day they can be married there. Though they currently do not wish to name their pastor or church, the couple said it will probably be acceptable. They could have gone to Canada. They could have dashed down to D.C. They could have even rushed up to Wright's boyhood church in New York, where the minister said he would marry them. But they don't live in those places, Wright said with a slightly annoyed smile.

"We want to get married in our church with our church family

there to celebrate with us," Gebhardtshauer said, matter-of-factly. "I want to get married in our church, in our state."

Right now, Pennsylvania laws do not provide Gebhardtshauer and Wright complete legal protection, even though they've always shared all their assets. Both of their families are completely supportive, but their wills and testaments could potentially be challenged if a family member wanted to prevent one of the men from receiving the other's money.

"We've had to go to lawyers and go through all these very complicated processes to help get us something closer to what a married couple would have," Wright said.

Senior Staff Attorney for the ACLU Leslie Cooper said wills are only one of the ways same-sex couples do not have the "automatic protection" of the law.

"If you die without a will and you're a married couple, the

Goreham presenting the couple with their certificate, Gebhardtshauer said it was important to have their relationship recognized.

Borough Manager Tom Fountaine said the domestic partnership provides an opportunity for couples — whether they are the same sex or not — to file an affidavit that could potentially give them additional benefits.

Various employers around State College will utilize the affidavit to provide same-sex couples with other benefits such as healthcare, but there is no legal mandate for employers to recognize the union, Fountaine said.

Two years after Goreham signed and approved the Domestic Partner Registry Ordinance, 18 couples are currently registered in State College, he said. Goreham, who said she agrees with the Supreme Court's decision to strike down the Defense of Marriage Act, said she's proud

to represent State College in the statewide issue.

"We are so happy that they are willing to stand up for the right thing," Goreham said. "Citizens can make a big difference, especially in this town."

Goreham said the couple is taking a "bold step" to rid Pennsylvania of "unwanted legislation."

As for the next step in the legal process, Cooper said it is up to the defendants to respond.

"We're looking forward to eventually getting to a trial in the case where we can put on the evidence to show that there is absolutely no justification to treat lesbian and gay couples differently than heterosexual couples, and deny these couples the same respect and protection that these other couples can count on," Cooper said.

Read full story on collegian.psu.edu.

To email reporter: [saj5180@psu.edu](mailto:saj5180@psu.edu)

# EXHIBIT PX-24-C

Office of the Clerk of the Circuit Court for Montgomery County, MD

State of Maryland

Montgomery County, Sct.

I HEREBY CERTIFY, That a Marriage License was issued to

RON GEBHARDTSBAUER Age 61 Marital Status SINGLE

GREGORY LEE WRIGHT Age 57 Marital Status SINGLE

on the 18th day of October A.D. 2013

as appears by the Record of Marriage Licenses of this office, Liber 845 Folio 279

And I further certify that a Certificate of Marriage was returned to this office on

November 27, 2013, by CAROLYN L THOMPSON, Minister or Authorized Official,

showing that the above named parties were married at ROCKVILLE MD

on November 27, 2013

In Testimony Whereof, I hereunto subscribe my name and  
affix the seal of the Circuit Court for Montgomery County,  
at Rockville, Maryland, this 27th  
day of November A.D. 2013



Loretta E. Knight  
Loretta E. Knight  
Clerk of the Circuit Court for Montgomery County

# EXHIBIT PX-24-D



GEBHARDTWRIGHT000669