

EXHIBIT PX-16

**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 LEN RIESER

I, Len Rieser, declare as follows:

1. I am 65 years old, and a Pennsylvania resident.
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 the impact, on me and my partner Fernando Chang-Muy, of the Commonwealth of Pennsylvania's refusal to permit us to marry.
3. I have reviewed the Declaration of Fernando Chang-Muy, which was also made in support of Plaintiffs' Motion for Summary Judgment. That declaration is accurate, and I agree with Fernando's statements in that declaration.

4. Fernando and I have lived together in a committed relationship for 32 years. I grew up in Vermont, but have lived in Philadelphia with Fernando since 1982.

5. My career has been in public-interest law, with a focus on serving children and families. I worked for thirty years at the Education Law Center of Pennsylvania, eventually becoming Co-Director and then Director. I left that position in 2012 and am now teaching at the University of Pennsylvania Law School and Temple University Law School.

6. Except for the fact that Pennsylvania does not recognize it as such, our relationship is indistinguishable from any other long-term marriage. Fernando and I have bought a house together, lived together, and managed our finances together. We have participated in community activities, and have developed a circle of shared friends. We adopted a child together and raised her to adulthood, and served as informal “foster parents” to another young adult. We have supported each other through illnesses and misfortunes, shared in the care of our aging parents, and helped each other deal with their deaths and the passing of other relatives and loved ones. And we have weathered the ups and downs of any long-term relationship, having committed ourselves to working through problems and differences rather than allowing them to break us apart.

7. Pennsylvania's refusal to allow us to marry means, to me, that the state considers our relationship—regardless of the degree of commitment that we have brought to it—to be less genuine, less significant, and less worthy than the relationships of opposite-gender couples.

8. Pennsylvania's refusal to allow us to marry has also had some very tangible consequences. For example, we have had to make special arrangements via wills, powers of attorney, and the like, which would not have been necessary if we were married and may not provide us or our daughter with the same level of protection than would be available to married couples. We had to adopt our daughter separately rather than together, and had to make special arrangements to make sure that schools, doctors, and other people and entities would recognize us both as her parents. We have paid taxes that we would not have had to pay if we had been married. And in many other respects, and in an ongoing way, our unrecognized relationship has resulted in effort and expenses that we would not otherwise have incurred.

9. I love Fernando, and want to be able to marry Fernando and have our marriage recognized in Pennsylvania.

10. 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: 4/16/14



Len Rieser