

# EXHIBIT PX-31

**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 VERONICA DONATO**

I, Veronica Donato, declare as follows:

1. I am 76 years old and a lifetime Pennsylvania resident. I have been married to my husband, Frank Donato, for 51 years and have two children. I have been a very active member of the Catholic church for my entire life.
2. My daughter, Christine Donato, and her partner, Sandra Ferlanie, are plaintiffs in the matter of *Whitewood et al. v. Wolf et al.* and I submit this declaration in support of Plaintiffs' Motion for Summary Judgment in that action.
3. Family is very important to us. We are very close with Sandy and with Sandy's parents. We celebrate holidays and special occasions with Christine and Sandy and, when we can, with Sandy's family as well. Sandy's family is our family. Even though Christine and Sandy have not been able to marry, I think of Sandy as my daughter-in-law and that is how I introduce her to my friends.

4. Since Christine was born, I have looked forward to the day that she would settle down and have children of her own. I was delighted when Christine and Sandy started their relationship and even more delighted when their son, H. F., was born.

5. Sandy and Christine love each and they have a son together, but Pennsylvania law forbids them from getting married. Marriage is a foundation for family, and is a public statement to everyone that the couple has made a commitment to one another. But Christine and Sandy are not allowed to make that statement.

6. I dream of seeing Christine and Sandy married one day and I want to be there when it happens. Because of my age and my health, however, I worry that, unless the law in Pennsylvania changes soon, I will not be able to share Christine and Sandy's wedding day with them.

7. About twenty years ago, I was diagnosed with multiple sclerosis. I am now confined to a wheelchair because I am paralyzed from the waist down and suffer from multiple other debilitating symptoms. I have also developed several comorbidities, including diabetes.

8. I have frequently been in and out of hospitals and nursing homes over the last five years and am often bedridden for days at a time. Drawing on her

nursing background, Sandy has been very active in helping me to deal with my medical condition.

9. Because of my condition, traveling is very difficult for me. We have a specially-converted van for my wheelchair that allows me to get to medical appointments. But if Christine and Sandy were to decide to marry outside of Pennsylvania, my health would likely prevent me from traveling to attend their wedding.

10. I hope that some day soon I will be able to see Christine and Sandy married in front of their family and friends and in their own church community in Swarthmore. That is what I want for Christine, Sandy, and H. F. Christine and Sandy deserve all the rights of any other married couple.

11. 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 18, 2014

  
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Veronica Donato