

## EXHIBIT PX-15

**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 FERNANDO CHANG-MUY**

I, Fernando Chang-Muy, declare as follows:

1. I am 59 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 importance of marriage to me and how the Commonwealth of Pennsylvania's refusal to allow my partner and me to marry is stigmatizing and hurtful.
3. My partner, Len Rieser, and I have lived together in a committed relationship for 32 years.
4. I was born in Cuba and emigrated to the United States with my family when I was a child. Len and I moved to Philadelphia together in 1982 when I was offered a job here. Philadelphia has been our home ever since.

5. Len and I are the proud parents of Isabel, whom we adopted when she was 10 months old. (A true and correct copy of a photograph of Len, Isabel, and me in our home, produced in this litigation as CHANGMUYRIESER001342, is attached as Exhibit PX-15-A. A true and correct copy of a photograph of Len, Isabel, and me when Isabel was a baby, produced in this litigation as CHANGMUYRIESER001347, is attached as Exhibit PX-15-B.) Len became Isabel's legal parent first, in 1994, and I completed a second-parent adoption in 1995. This two-step process, which meant that for an entire year I was not Isabel's legal parent, would have been unnecessary if we had been married. Isabel is now nearly 22, attends Temple University, works as a Sunday School teacher at our church, and also works part-time at a program at Bryn Mawr College.

6. Len and I are both lawyers and professors who have dedicated our careers to the public interest. I have taught courses on immigration and refugee law and policy at the University of Pennsylvania Law School and non-profit management at the University's School of Social Policy and Practice.

7. Len and I entered into a civil union in Vermont on February 14, 2004. (A redacted copy of our Vermont License and Certificate of Civil Union, produced in this litigation as CHANGMUYRIESER000242, is attached as Exhibit PX-15-C.) We celebrated the occasion with our family at Len's parents' house there. (A true and correct copy of a photograph of Len and me and Isabel taken on the day of

our civil union, produced in this litigation as CHANGMUYRIESER001345, is attached as Exhibit PX-15-D.) Although obtaining the civil union was an important moment for us, it also reinforced the fact that our relationship is not legally recognized in the state where we actually live.

8. I love Len and I want to be able to marry Len in Pennsylvania, the state where we've lived for more than 30 years, and have our marriage recognized in Pennsylvania. We view marriage as an appropriate recognition of the deep and permanent commitment we have made to each other. If we could marry, it would also mean a lot to Isabel, who would like us to be married to each other.

9. When Isabel was growing up, it was important to Len and me that Isabel have the same sense of security that any other child gets from being part of a loving family. Len and I made a point, when Isabel was in elementary and secondary school, of making sure that her teachers understood that we were a family and that we wanted to be active in the school community just like any other parents. Fortunately, we found school personnel who supported us, as well as supportive health care providers, neighbors, and a supportive religious community.

10. Len and I recognize that, even if we had been able to be married while we were raising Isabel, the process of establishing us as a family still would have had its challenges because there are people who disapprove of relationships like ours. But we feel that if marriage had been available to us, a major barrier to our

acceptance and well-being as a family would have been removed. Even now, the availability of marriage would make a significant, positive difference to our life as a family.

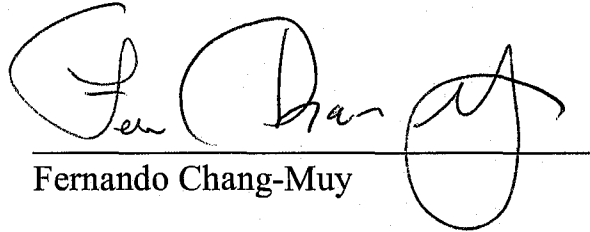
11. Because Len and I are lawyers, we are particularly aware of how vulnerable we are by being excluded from the many legal protections that go along with marriage. We have done everything that lawyers can do to protect ourselves in the absence of marriage, such as drawing up wills and powers of attorney. But we know that there is nothing we can do to access most of the protections and benefits available to married couples.

12. Pennsylvania's refusal to allow us to marry belittles the commitment that Len and I made to one another and devalues our family.

13. 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 17, 2014

  
Fernando Chang-Muy

## EXHIBIT PX-15-A



CHANGMUYR  
EISER001342



## EXHIBIT PX-15-B







## EXHIBIT PX-15-C

## CERTIFICATION OF VITAL RECORD

## STATE OF VERMONT

DH-PHS-CU-00

DEPARTMENT OF HEALTH  
VERMONT LICENSE AND CERTIFICATE  
OF CIVIL UNION

LOCAL FILE NUMBER

STATE FILE NUMBER

TYPE OR PRINT IN  
BLACK INK.  
SEE MANUAL FOR  
INSTRUCTIONS.

| PARTY A  |  |   |  |
|--|--|---|--|
| 1. NAME (First, Middle, Last)<br><b>Fernando Chang-Muy</b>                                   |  | 1b. MAIDEN SURNAME (If Applicable)  |  |
| 2. SEX<br><b>M</b>   |  | 1c. DATE OF BIRTH (Month, Day, Year)  |  |
| 3. MAILING ADDRESS (Street and Number or Rural Route Number, City or Town, State, Zip Code)  |  |   |  |
| 4a. USUAL RESIDENCE - STATE<br><b>Pennsylvania</b>   |  | 4b. CITY OR TOWN<br><b>Philadelphia</b>   |  |
| 5. BIRTHPLACE (State or Foreign Country)<br><b>Cuba</b>                                      |  | 6a. FATHER'S NAME (First, Middle, Last)<br><b>Fernando Chang-Muy</b>  |  |
| 6b. BIRTHPLACE (State or Foreign Country)<br><b>China</b>                                    |  | 7a. MOTHER'S NAME (First, Middle, Maiden Surname)<br><b>Juana Asia</b>  |  |
| 7b. Birthplace (State or Foreign Country)<br><b>Cuba</b>                                     |  | 8a. NAME (First, Middle, Last)<br><b>Leonard Rieser</b>   |  |
| 8b. MAIDEN SURNAME (If Applicable)   |  | 8c. DATE OF BIRTH (Month, Day, Year)  |  |
| 9. SEX<br><b>M</b>   |  |   |  |
| 10. MAILING ADDRESS (Street and Number or Rural Route Number, City or Town, State, Zip Code) |  |   |  |
| 11a. USUAL RESIDENCE - STATE<br><b>Pennsylvania</b>  |  | 11b. CITY OR TOWN<br><b>Philadelphia</b>  |  |
| 12. BIRTHPLACE (State or Foreign Country)<br><b>California</b>                               |  | 13a. FATHER'S NAME (First, Middle, Last)<br><b>Leonard Moos Rieser</b>  |  |
| 13b. BIRTHPLACE (State or Foreign Country)<br><b>Illinois</b>                                |  | 14a. MOTHER'S NAME (First, Middle, Maiden Surname)<br><b>Rosemary</b>   |  |
| 14b. Birthplace (State or Foreign Country)<br><b>New Jersey</b>                              |  | 15a. SIGNATURE<br><i>Fernando Chang-Muy</i>   |  |
| 15b. DATE SIGNED<br><b>2/14/04</b>   |  | 15c. SIGNATURE<br><i>Leonard Rieser</i>   |  |
| 15d. DATE SIGNED<br><b>12/31/03</b>  |  | 16. I hereby certify that the information provided is correct to the best of our knowledge and belief and that we are free to form a civil union under the laws of Vermont. |  |
| 17. SIGNATURE<br><i>Bennie J. Munday</i>   |  |   |  |
| 18. DATE SIGNED<br><b>2/14/04</b>  |  |   |  |
| 19. SIGNATURE<br><i>Donald B. Pollson</i>  |  |   |  |
| 20. DATE SIGNED<br><b>12/31/03</b>   |  |   |  |
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| 99. SIGNATURE<br><i>Donald B. Pollson</i>  |  |   |  |
| 100. DATE SIGNED<br><b>12/31/03</b>  |  |   |  |

## REGISTRATION

|  |  |   |  |
|--|--|---|--|
| 18a. CLERK'S SIGNATURE<br><i>Bennie J. Munday</i>  |  | 18b. DATE RECEIVED BY LOCAL REGISTRAR<br><b>February 17, 2004</b> |  |
| 19a. TRUE COPY - (Clerk's Signature) (To be signed by Registrar on copy only)<br><i>Bennie J. Munday</i> |  | 19b. TOWN<br><b>Norwich</b>                                       |  |
| 19c. DATE<br><b>March 11, 2004</b>   |  | 19d. DATE<br><b>March 11, 2004</b>                                |  |

THIS IS A TRUE AND EXACT REPRODUCTION OF THE DOCUMENT OFFICIALLY REGISTERED AND PLACED ON  
FILE IN THIS OFFICE.

PLACE ISSUED

**Norwich**

ATTEST:

*Bennie J. Munday*

DATE ISSUED:

**March 11, 2004**

This copy not valid unless prepared on engraved border displaying State Seal.

ANY ALTERATION OR ERASURE VOIDS THIS CERTIFICATE

CONFIDENTIAL

CHANGMUYREISER000242

## EXHIBIT PX-15-D





CHANGMUYREISER001345