

Kaitlin Banner, Esq.

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Plaintiffs' Exhibit**11**

Civ. No. 21-00997 (CJN)

EXPERIENCE**Washington Lawyers' Committee for Civil Rights & Urban Affairs***Deputy Legal Director*

August 2018 – Present

- Lead three practice groups teams (education justice, public accommodations, workers' rights), including setting strategic priorities focused on racial justice, responding to emerging trends and crises, and managing a portfolio of systemic cases to address race and disability inequality in the DC area
- Successfully litigate systemic, complex federal court litigation in civil rights cases, including litigating under the Constitution and §1983; and the Americans with Disabilities Act and Rehabilitation Act. Sample cases include *Charles H. v. District of Columbia* (class action to address failure to provide special education at the DC Jail); *Black Lives Matter et. al vs. Trump et. al* (class action challenging the assault on protesters at Lafayette Square); and *Costa et. al v. Bazron et al.* (challenging failure of psychiatric hospital to keep patients safe during public health emergencies)
- Advocate before the Council of the District of Columbia on youth justice, education, and disability rights
- Serve as media spokesperson on education and disability justice
- Supervise teams of attorneys and paralegals, including hiring, assigning and reviewing work product, and providing performance reviews
- Represent management in collective bargaining with staff union, including successfully negotiating a first collective bargaining agreement

Advancement Project*Deputy Project Director*

December 2016 – August 2018

- Manage the Opportunity to Learn Program including creating work plans, overseeing work product, fundraising, and managing budget
- Engage national and local grassroots partners to strategize, provide legal and policy support, and build public support to end the school to prison pipeline
- Manage attorneys, program associates, and interns, including assigning and reviewing work product, conducting regular supervision meetings, and providing performance reviews
- Serve as media spokesperson on education and juvenile justice
- Serve as Acting Director as needed (June 2017 – August 2018)

Senior Staff Attorney

April 2016 – December 2016

Staff Attorney

November 2012 – March 2016

- Conduct federal legislative, federal administrative, statewide, and local advocacy and education to advance policies that would end the school-to-prison pipeline
- Draft legal memorandum, administrative complaints, testimony, and legislative language; conduct research, and analyze policies and data relating to the school-to-prison pipeline
- Create community-friendly materials to explain legal concepts, including reports, toolkits, power point presentations, and fact sheets
- Primary author of *Breaking the School To Prison Pipeline: The Crisis Affecting Rochester's Schools and What We Can Do to Fix It* (November 2014) and *Police in Schools are Not the Answer to the Newtown Shooting* (January 2013)

Georgetown University Law Center*Adjunct Professor, Juvenile Justice Clinic*

August 2012 – Present

- Train and supervise law students in law and procedures of school disciplinary cases
- Consult with law students on issues involving delinquency clients and the D.C. public schools

Adjunct Professor, Human Rights Institute

August 2011 – May 2012

- Co-taught a weekly practicum course, including designing a practicum course, *Human Rights Fact-Finding Seminar: Vulnerable Children and the School-to-Prison Pipeline*

University of the District of Columbia – David A. Clarke School of Law*Clinical Instructor – Took Crowell Institute for At-Risk Youth*

September 2010 – October 2012

- Supervise law students representing youth and parents in special education and school discipline cases
- Co-teach bi-weekly law school clinic class, including syllabus design and implementation, and teaching skills and substantive law, including special education and delinquency law

American Civil Liberties Union of the Nation’s Capital*Crowell & Moring Foundation Equal Justice Works Fellow*

September 2008 – August 2010

- Develop and implement an innovative project providing services to D.C. public school students facing disciplinary action; provided direct representation to students at administrative hearings
- Promote sound policy on issues affecting juveniles, including drafting comments and testifying on proposed regulations and legislation before the D.C. government

Lawyers’ Committee for Civil Rights of the San Francisco Bay Area*Jesuit Volunteer/Clinic Coordinator*

August 2004 - August 2005

- Manage client intake and coordinated placement of civil legal services cases with pro bono attorneys

EDUCATION & ADMISSIONS

Bar Admissions

- District of Columbia, April 2010
- New York, Third Judicial Department, January 2009
- District Court of the District of Columbia, October 2018
- Court of Appeals for the Fourth Circuit, July 2020

The University of the District of Columbia – David A. Clarke School of Law

LL.M., May 2012

Washington, DC

The George Washington University Law SchoolJuris Doctor, May 2008 *with high honors*

Washington, DC

Villanova UniversityBachelor of Arts, May 2004, *summa cum laude*

Villanova, PA

- Majors in Honors, Political Science, Sociology; Minor in Spanish
- Phi Beta Kappa

SELECTED TRAINING & PRESENTATIONS

- *Accessible COVID Testing: A Multi-Faceted Approach to Accessible Public Health*, 2023 Jacobus tenBroek Disability Law Symposium (March 2023)
- *Mask Battles: Freedom, Civil Rights, and Disability in Schools During a Pandemic*, Council of Parents, Attorney, and Advocates (COPPA) National Conference (March 2023)
- *Litigating the IDEA Rights of Incarcerated Students During COVID-19*, Council of Parents, Attorney, and Advocates (COPPA) National Conference (March 2022)
- *Pathways into the Juvenile Justice System: The School to Prison Pipeline*, Center for Juvenile Justice Reform, Georgetown University Reducing Racial and Ethnic Disparities in Juvenile Justice Certificate Program (September 2013; August 2015; October 2016; November 2018; March 2019; November 2019)
- *Moving towards the Decriminalization of Children of Color: Models for Change*, 2019 Judicial and Bar Conference on Children and the Law: Protecting the Future (April 2019)

- *Advocacy in School Discipline & Special Education Hearings*, National Juvenile Defender Center (NJDC) and Georgetown Law Juvenile Training Immersion Program (JTIP) (June and August 2014)
- *Dismantling the Pipeline*, National Juvenile Defender Center Summit (November 2013)
- *School Discipline: Administrative Practice and Implications for Representation in Court*, Superior Court of the District of Columbia Family Court Training for New Special Education Panel Attorneys (May 2012; June 2011)
- *Innovative Organizing Strategies: Three Case Studies*, Council of Parents, Attorney, and Advocates (COPPA) National Conference (March 2012)

PUBLICATIONS

- “Breaking the School-to-Prison Pipeline: New Models for School Discipline and Community Accountable Schools,” *A New Juvenile Justice System: Total Reform For A Broken System*, edited by Nancy Dowd

COMMUNITY INVOLVEMENT

George Washington University Law School Public Interest Advisory Council

Council Member

December 2021 – Present

D.C. Lawyers’ for Youth

Board Member

November 2012 – December 2017

Board Chair

April 2014 – November 2014

Board Vice Chair

January 2013 – April 2014

- As Chair, oversaw board and executive committee meetings, worked with the nominating committee to recruit new board members, and worked in partnership with the chief executive to make sure board resolutions are carried out

MARJA K. PLATER

BAR ADMISSIONS

Maryland State Bar (admitted December 18, 2008)

U.S. District Court for the District of Maryland (admitted September 23, 2011)

District of Columbia Bar (admitted August 9, 2022)

U.S. District Court for the District of Columbia (admitted February 6, 2023)

PROFESSIONAL EXPERIENCE

Washington Lawyers' Committee for Civil Rights and Urban Affairs Washington, D.C.

Senior Counsel

July 2021 - present

Develop and pursue civil rights litigation and policy advocacy to promote the rights of young people in the Washington, D.C. region, focusing on addressing systemic discrimination faced by young people of color and other marginalized identities. Duties include working in partnership with pro bono law firms to handle all aspects of litigation in Federal and State courts by developing a case theory, researching applicable case law and statutes, reviewing documents, drafting pleadings, motions, and memoranda, conducting and responding to discovery, interviewing clients and witnesses, and negotiating settlements and participating in mediation. Collaborate with other legal organizations, community-based organizations, and directly impacted people on coalitions to advocate for policy change.

Maryland Legal Aid

Staff Attorney

Baltimore, MD

April 2019 – July 2021

Represented and advised clients in Family Law matters, including divorce, child custody, child support visitation, guardianship, and domestic violence issues. Duties included handling all aspects of litigation, like researching applicable case law and statutes, reviewing documents and case files, drafting pleadings, motions and memoranda, conducting and responding to discovery, interviewing clients and preparing witnesses for trial, negotiating settlements, and appearing on behalf of clients in the District and Circuit Courts for Baltimore City. Drafted appellate briefs and participated in oral arguments before the Court of Special Appeals of Maryland. Participated in community outreach by providing legal advice on a walk-in basis to clients seeking assistance with a diverse range of Family Law issues. Served as a mentor to high school students through the Community Law in Action (CLIA) program by assisting them in developing leadership skills, career exposure and college readiness.

The Franklin Law Group, P.C.

Supervising Attorney

Catonsville, MD

February 2017 – March 2019

Staff Attorney

February 2014 – January 2017

Maintained a daily case load between 80 to 150 cases while providing guidance to up to four staff attorneys representing children and youth involved in Children in Need of Assistance (CINA) and Termination of Parental Rights (TPR) matters in the Juvenile Courts in Maryland. Duties included in court supervision and observation of staff attorneys; providing training and attorney development; drafting practice manuals and guides; assisting staff attorneys with case planning and preparation for court hearings in Circuit Court and Appellate Courts of Maryland; handling all aspects of litigation including, researching applicable case law, statutes, and regulations; preparing legal briefs and memoranda, reviewing documents and case files, interviewing clients and potential witnesses, preparing witnesses for trials; coordinating with stakeholders in the community involved in Child Welfare and related areas of practice; completing projects and managing the operations of the firm in the absence of the President & CEO. Drafted appellate briefs; and argued before the Court of Special Appeals of Maryland. Served as the firm's representative on the Coalition to Protect Maryland's Children (CPMC), a legislative advocacy group.

CACI International, Inc.

Law Clerk

Washington, D.C.

March 2010 – February 2014

Provided litigation support to the U.S. Department of Justice, Civil Division on claims arising under the Federal Tort Claims Act. Gathered, prepared, and summarized resources for use by attorneys in preparation

of depositions, briefs and legal documents related to ongoing litigation. Screened documents for privilege according to established guidelines and criteria. Assisted with writing and editing manuals and procedures.

Contract Attorney

Ober, Kaler, Grimes & Shriver, P.C., Baltimore, MD
Wilson, Sonsini, Goodrich & Rosati, Washington, D.C.
Kirkland & Ellis, LLP, Washington, D.C.

April 2009 – February 2010
 December 2008 – January 2009

Provided critical litigation support to federal investigations involving a pharmacy's credit and return process for prescriptions paid for by Medicare Part D drug plans; a software company's recent mergers and acquisitions with a focus on possible anti-competitive issues; alleged violations of the Foreign Corrupt Practices Act (FCPA); a settlement agreement resolving a case involving pharmaceutical patent infringement.

Superior Court of the District of Columbia

Law Clerk to The Honorable Fern Flanagan Saddler

Washington, D.C.

August 2006 – August 2008

Drafted orders for the court, including, review of Magistrate Judge's decisions, drafted interoffice memoranda, and conducted legal research. Interviewed and managed judicial interns. Reviewed motions daily concerning various civil and criminal matters, including but not limited to, juvenile delinquency, child abuse and neglect, adoptions and domestic relations issues. Interacted with other judges, attorneys, *pro se* litigants, and diverse court staff on a daily basis. Scheduled court hearings.

EDUCATION

American University, Washington College of Law, Washington, D.C.

Juris Doctor, May 2006

Activities: Black Law Students Association; Marshall Brennan Constitutional Literacy Project Fellow; Mid-Atlantic Innocence Project Extern; Dean's Fellow for Professor Pamela Bridgewater

Study Abroad: Law Program in Santiago, Chile, May 2004 – June 2004

Hampton University, Hampton, Virginia

B.A. Political Science, *Cum Laude*, May 2003

Honors College Graduate, September 2001-May 2003

Awards: Presidential Scholar, Dean's List 1999-2003, National Dean's List Award, Golden Key International Honor Society, Pi Sigma Alpha National Political Science Honor Society

PUBLICATIONS

Marja K. Plater, *Education as a Civil Right: An Evolving View of Education in America*, A.B.A. Sec. Child. & the L. Young Law. Div. Comm., Winter 2014, Vol. 1, No. 1

Marja K. Plater, *In Spite of the Odds: Achieving Educational Stability for Maryland's African American Foster Youth*, 39 Child. Legal Rts. J., 88 (2019)

PROFESSIONAL ASSOCIATIONS

Member at Large, (2009-2012), Judicial Nominating Committee Co-Chair (2013-2016), Alliance of Black Women Attorneys of Maryland, Inc.

Member, Maryland State Bar Association, Inc.

Member, Bar Association of Baltimore City

Member, J. Franklyn Bourne Bar Association

EXPERIENCE

Washington Lawyers' Committee for Civil Rights and Urban Affairs

Senior Counsel (40+ hours/week)

Counsel (40+ hours/week)

Washington, DC

July 2021 to Present

January 2019 to July 2021

- Utilize structural litigation, non-litigation advocacy, and direct services to represent individual and organizational clients subjected to discrimination by government programs, places of public accommodations, and in education. Cases often involve intersectional discrimination based on disability, race, gender, and socio-economic status, requiring policy arguments, statutory and constitutional claims, and creative thinking to resolve the matter.
 - Interview potential clients and witnesses, analyze evidence and data to determine veracity of case and viability of discrimination claims.
 - Develop legal strategy and legal arguments to protect clients' civil rights under the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, Individuals with Disabilities Education Act, local human rights laws, constitutional and tort claims.
 - Conduct investigations into allegations of discrimination. Investigations include client interviews, witness interviews, document review, drafting FOIA requests, and site visits.
 - Draft demand letters, complaints, motions, briefs, discovery documents, stipulations of settlement, and amicus briefs.
 - Negotiate settlement agreements using traditional settlement negotiation, private mediation, and via court appointed mediators such as the Circuit Mediation Program, U.S. Court of Appeals, D.C. Circuit.
 - Monitor compliance with multi-year settlement agreements.
 - Illustrative matters involve:
 - Cruel and Usual: An Investigation into Prison Abuse at USP Thomson: lead investigator and co-author of report detailing constitutional and civil rights violations of individuals incarcerated in the Special Management Unit of the BOP;
 - Costa et al. v. Bazron et al., United States District Court for the District of Columbia, Civil Action No. 1:19-cv-03185-RDM, represented individuals with mental illness seeking appropriate emergency protocols in a state run psychiatric facility;
 - Wheeler v. American University et al.; United States District Court for the District of Columbia, Civil Action No. 1:20-cv-2735-CRC, represented individual with mental illness in ADA and constitutional claims against university police and the DC Metropolitan Police Department.
- Engage in public advocacy with local, DC, state, and federal agencies including state and local education agencies, secretary of state's offices, agencies involved in the criminal legal system, and the DC Developmental Disabilities Council to advocate for individuals with disabilities to have

equitable access to programs administered by public entities.

- Illustrative issues: successfully advocated for regulations governing seclusion and restraint of students with disabilities in DC, advocating for accessible absentee voting systems in West Virginia and DC, advocating for the rights of individuals with disabilities to train service animals in places of public accommodation.
- Testify before the DC Council on a broad range of legislation impacting my clients.
- Work effectively with organizational clients, in partnership with policy and advocacy organizations, and strategically with governmental agencies.
- Conduct outreach at national, state, and local levels and handle press inquiries.

Disability Rights DC at University Legal Services, The Protection and Advocacy Organization for the District of Columbia

Washington, DC

Staff Attorney (40 hours/week)

August 2015 to December 2019

- Utilized advocacy and direct services to represent clients subjected to disability based discrimination.
 - Identified the barriers preventing my clients from accessing programs operated by public entities and places of public accommodations.
 - Researched statutes, legislative history, public policy, precedent, applicable regulations and procedures to develop background information and points of law to best represent my clients in claims arising under the Americans with Disabilities Act, Individuals with Disabilities Education Act, Section 504 of the Rehabilitation Act, and the Workforce Innovation and Opportunity Act.
 - Draft interrogatories, legal memoranda, complaints, briefs, subpoenas, motions, and other pleadings.
 - Prepared witnesses and present my client's case at administrative hearings, participate in settlement negotiations, draft stipulations of settlement.
 - Provided information to individuals with disabilities regarding their rights to live in the community with vocational rehabilitation and educational services, public benefits, and accommodations.
- Testified before the DC Council on a broad range of proposed legislation impacting the disability community.
- Represented Disability Rights DC on committees and workgroups including as a member of the State Rehabilitation Council, State Advisory Panel on Special Education, and the Secondary Transition Community of Practice.
- Conducted outreach to the community to identify priorities. Conduct training for the community regarding the ADA, IDEA, Section 504, and the Workforce Innovation and Opportunity Act.

Lewis Johs Avallone Aviles, LLP

New York, New York

Associate- Special Education Practice Group (40+ hours/week)

January 2012 to August 2015

- Formulated and executed legal strategy for a full caseload of special education claims including representation at Individualized Education Program meetings and administrative hearings and appeals for tuition reimbursement/funding, compensatory education, and independent educational evaluations arising under the IDEA, Section 504 of the Rehabilitation Act, and the ADA.
- Prepared due process complaints, prepared witnesses to testify, delivered opening and closing statements, introduced evidence, conducted direct and cross-examination, prepared briefs, letters, correspondence, and stipulations of settlement.
- Testified before the New York State Education Department on proposed changes to regulations governing impartial due process hearing procedures.

AHRC New York City

New York, New York

Education Advocacy Program Associate (40 hours/week)

December 2010 to January 2012

- Analyzed student evaluations and Individualized Education Plans and developed an advocacy plan for clients to secure appropriate services for their children.
- Conducted advocacy skill training for parents regarding the IDEA, Section 504 of the Rehabilitation Act, and state and federal special education case law.
- Monitored and analyzed changes to special education policy and prepared memos to the Education Advocacy Team regarding new developments in special education law.

BAR ADMISSIONS

New York, Second Judicial Department, September 2012

District of Columbia, February 2016

District Court of the District of Columbia, May 2019

EDUCATION

Temple University, Beasley School of Law, Philadelphia, Pennsylvania, *JD*, May 2010

Fordham University, Bronx, New York, *B.A.*, International Political Economy, May 2007

SELECTED PRESENTATIONS

2022 Legislative Advocacy Landscape, American Council of the Blind, ACB 2022 Legislative Seminar
Elections, Access, and COVID-19: Opportunities for Advocacy, National Disability Rights Network,
NDRN 2022 Virtual Conference Institute

Accessible COVID Testing: A Multi-faceted Approach to Accessible Public Health, National
Federation of the Blind, TenBroek Symposium, March 2023.

HONORS/RECOGNITION

Barrack Public Interest Fellow 2011, Super Lawyers Rising Star 2014, Irish Echo 40 Under 40 of 2019