

3. SALT is the largest membership organization of law professors in the United States with nearly 900 members. SALT is a progressive organization, whose members are on the faculties of 159 law schools in 44 states, including New Jersey, the District of Columbia, Puerto Rico and four foreign countries. Since its founding thirty years ago, SALT has been deeply engaged in efforts to make the legal profession more inclusive, enhance the quality of legal education, and extend the power of law to underserved individuals and communities. SALT's mailing address is: c/o Professor Paula C. Johnson, Syracuse University College of Law, Syracuse, New York 13244.

4. To be sure, there is a history of discrimination in the legal profession, and law schools were not always free from blame. For example, a generation ago, many law schools were regarded as hypocritical and disingenuous, professing a commitment to equality of opportunity while permitting employers to interview on campus who had no interest (and a demonstrated track record to prove it) in hiring our female graduates. But members of the academy, including SALT, put a stop to it by requiring compliance with our non-discrimination policies. Since passage of the Solomon Amendment, this charge of hypocrisy once again has been voiced -- vehemently and, I confess, appropriately -- by our gay and lesbian students and their supporters demanding that we walk the talk.

5. SALT has joined this litigation precisely so that its members and their academic institutions can walk the talk.

6. As law professors, SALT members are responsible for fostering an environment conducive to respectful, open dialogue on fundamental issues of law and justice. Necessarily, SALT members consider the nondiscrimination policies of their

schools, and the values those policies express, to be more than window dressing -- that is, to be central to their mission and to their roles as law professors.

7. The claims that SALT raises in this litigation, therefore, are integral to its mission. The Solomon Amendment, which SALT challenges in this lawsuit, impairs the ability of SALT and its members to enforce, express, and live the values embodied in the nondiscrimination policies of their schools.

8. As described in the Complaint filed in this action, SALT and its members therefore have suffered and will continue to suffer irreparable harm as long as the military is allowed to enforce the Solomon Amendment. By filing this lawsuit, SALT seeks a remedy for the harm caused to it and its members by the Solomon Amendment. Were this Court to grant the relief SALT seeks in this lawsuit, the harm to SALT and its SALT members caused by the Solomon Amendment would cease.

9. SALT is not seeking monetary damages, and no individualized determinations of damages need to be made by this Court to resolve this lawsuit. Thus, the participation of SALT's members individually is not necessary to this action.

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

Dated: September 18, 2003
Seattle, Washington


Michael Rooke-Ley