DECLARATION OF MELISSA HADDEN

COMES NOW, Melissa Hadden and pursuant to 28 U.S.C. § 1746, declares under penalty of perjury that the following is true and correct:

1. My name is Melissa Hadden, and I am over 18 years old. I have personal knowledge of the facts as stated herein.
2. I am the mother of V.M.H., who is 3 years old and is in preschool and has been diagnosed with heart disease, periventricular leukomalacia, autism, cerebral palsy, cortical digital impairments, and optic nerve hypoplasia. My child is at risk of severe illness should she contract COVID-19.
3. Because my child is under the age of 12, my child not eligible to receive any of the currently authorized Covid-19 vaccines.
4. My child attends school at the Council Bluffs School District. We live in Pottawattamie County, Iowa.
5. The doctor for my child has recommended for medical reasons that it would be best for her not to attend school in person; if services can be offered one-on-one or remotely, that would be reasonable. *See* Exhibit A (Letter from Doctor Jamie Drake).
6. The Council Bluffs School District for the upcoming school year is offering a 100% remote learning option; however, the online option is not available for preschool students.
7. My child, V.M.H., went to preschool in-person last year because masks were required at the school. In-person instruction provides the best mode of instruction for my children's needs.
8. Last year, the Council Bluffs School District had a mask mandate until the mask mandate ban went into effect. Once the ban went into effect, mask usage at school dropped off—

none of my child's teachers wore masks and very few children in the school were wearing masks.

9. At the parents' night on August 19, 2021, and the back-to-school night on August 20th, no teachers, staff, or students were wearing masks.
10. Since the start of school, no teachers, staff members, or students are wearing masks at the school. The students are not socially distanced in the classroom.
11. For this school year, I have made the difficult decision to send my child to in-person school. The school district is not offering online learning for children in preschool. I work in-person part-time. Homeschooling is not an option for our family.
12. I am diabetic, which makes me more susceptible to Covid-19 if my child were to become infected at school and bring it home.
13. As a result of Iowa's law, my child is having to take unnecessary risks to her health in order to get an education.
14. I am seeking to have HF847 blocked so that my school will be able to require universal masking as necessary to meet its obligations to my child.

I swear under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dates this 2 day of September 2021, at Council Bluffs, Iowa.

M Hadden

Melissa Hadden, Plaintiff