

IN THE UNITED STATE DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

TERESA LOPEZ, on behalf of herself	:	
and all others similarly situated,	:	
Plaintiffs,	:	Index No. CV 98-7204
	:	
v.	:	(Sifton, Ch. J.)
	:	
DELTA FUNDING CORP., et al.,	:	
Defendants.	:	

**DECLARATION OF BERTHA LEWIS**

I, Bertha Lewis, state:

1. I am the Executive Director of the New York chapter of the Association of Community Organizations for Reform Now (“NY ACORN”). ACORN is the nation's largest community organization of low and moderate-income families, with over 120,000 member families organized into 600 neighborhood chapters in 45 cities across the country. ACORN’s priorities include better housing for home buyers and tenants, living wages for low-wage workers, more investment in our communities from banks and governments, and better public schools. ACORN achieves these goals by building community organizations that have the power to win changes — through direct action, negotiation, legislation, and voter participation.

2. NY ACORN is one of ACORN’s chapters. It has over 23,000 members. NY ACORN organizes and recruits members solely in low and moderate-income neighborhoods, such as those subject to the predatory lending practices of the defendants in the above-styled lawsuit.

3. In my capacity as NY ACORN Executive Director, I am responsible for the day-to-day operations of the chapter and for taking actions on behalf of our membership and the interests of the low and moderate-income communities that we serve. In consultation with the

staff of New York ACORN Housing Corporation, who work on predatory lending issues, and on behalf of NY ACORN membership, I have authorized NY ACORN to object to the settlement of the above-styled class action suit.

4. I have read the declaration of Ismene Speliotis dated May 10, 2002 submitted in support of NY ACORN's objections to the class action settlement in this case. Ms. Speliotis was authorized by me to sign that declaration on behalf of NY ACORN, and NY ACORN hereby adopts Ms. Speliotis' declaration in support of its objections to the settlement in this case.

Signed under the pains and penalties of perjury pursuant to 28 U.S.C. 1746 in Brooklyn, New York, on May 10, 2002.

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Bertha Lewis  
Executive Director, NY ACORN