

The Honorable MARSHA J. PECHMAN

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

TRUEBLOOD *et al.*,

Plaintiffs,

v.

WASHINGTON STATE DEPARTMENT OF  
SOCIAL AND HEALTH SERVICES *et al.*,

Defendants.

NO. C14-1178 MJP

NOTICE OF APPEAL

NOTICE IS HEREBY GIVEN that Kevin Quigley, Secretary of the Washington State Department of Social and Health Services; Ron Adler, Chief Executive Officer of Western State Hospital; Dorothy Sawyer, Chief Executive Officer of Eastern State Hospital; the Department of Social and Health Services; Western State Hospital; and Eastern State Hospital, or their successors, Defendants in the above named case, hereby appeal to the United States Court of Appeals for the Ninth Circuit from the U.S. District Court, Western District of Washington: (1) Judgment in a Civil Case dated April 2, 2015 (Dkt. #132); (2) Findings of Fact and Conclusions of Law dated April 2, 2015 (Dkt. #131); (3) Order Granting Plaintiffs' Motion for Summary Judgment dated December 22, 2014 (Dkt. #104); (4) Order on Defendants' Motion for Clarification and Reconsideration dated May 6, 2015 (Dkt. #153); and (5) Minute Entry Denying All Motions in Limine dated March 10, 2015 (Dkt. #117).

//

1 Defendants' Representation Statement is attached to this Notice, as required by the  
2 Ninth Circuit Rule 3-2.

3 RESPECTFULLY SUBMITTED this 5th day of June 2015.

4 ROBERT W. FERGUSON  
5 Attorney General

6 

7 SARAH J. COATS, WSBA No. 20333  
8 JOHN K. MCILHENNY, JR., WSBA No. 32195  
9 AMBER L. LEADERS, WSBA No. 44421  
10 NICHOLAS A. WILLIAMSON, WSBA No. 44470  
11 Assistant Attorneys General  
12 Attorneys for Defendants  
13 Office of the Attorney General  
14 7141 Cleanwater Drive SW  
15 PO Box 40124  
16 Olympia, WA 98504-0124  
17 (360) 586-6565  
18  
19  
20  
21  
22  
23  
24  
25  
26

CERTIFICATE OF SERVICE

*Beverly Cox*, states and declares as follows:

I am a citizen of the United States of America and over the age of 18 years and I am competent to testify to the matters set forth herein. I hereby certify that on this 5th day of June, 2015, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

David Carlson: [davidc@dr-wa.org](mailto:davidc@dr-wa.org)

Emily Cooper: [emilyc@dr-wa.org](mailto:emilyc@dr-wa.org)

Anna C. Guy: [annag@dr-wa.org](mailto:annag@dr-wa.org)

Margaret Chen: [mchen@aclu-wa.org](mailto:mchen@aclu-wa.org)

LaRond Baker: [lbaker@aclu-wa.org](mailto:lbaker@aclu-wa.org)

Anita Khandelwal: [anitak@defender.org](mailto:anitak@defender.org)

Christopher Carney: [Christopher.Carney@cgilaw.com](mailto:Christopher.Carney@cgilaw.com)

Sean Gillespie: [Sean.Gillespie@cgilaw.com](mailto:Sean.Gillespie@cgilaw.com)

Kenan Isitt: [Kenan.isitt@cgilaw.com](mailto:Kenan.isitt@cgilaw.com)

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Dated this 5th day of June 2015 at Olympia, Washington.

*Beverly Cox*

Beverly Cox  
Legal Assistant

Office of the Attorney General  
7141 Cleanwater Drive SW  
PO Box 40124  
Olympia, WA 98504-0124  
(360) 586-6565