THE HON. MARSHA J. PECHMAN 1 2 3 4 5 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 6 A.B., by and through her next friend CASSIE No. 14-cv-01178-MJP 7 CORDELL TRUEBLOOD, et al., 8 Plaintiffs. 9 DECLARATION OF EMILY COOPER IN v. SUPPORT OF PLAINTIFFS' MOTION 10 TO RECONSIDER SCOPE OF WASHINGTON STATE DEPARTMENT OF SOCIAL AND HEALTH SERVICES, et al., INJUNCTION REGARDING IN-JAIL 11 **EVALUATIONS** Defendants. 12 13 14 15 16 I, Emily Cooper, declare as follows: 17 1. I am over the age of eighteen, am counsel for Plaintiffs, have personal knowledge 18 of the matters stated herein, and am competent to testify thereto. 19 2. Attached as Exhibit A is a true and accurate copy of an excerpt of the Verbatim 20 Report of Proceedings dated March 16, 2015. 21 Attached as Exhibit B is a true and accurate copy of the Senate Bill 5889. 3. 22 4. Attached as Exhibit C is a true and accurate copy of an excerpt of the Verbatim 23 Report of Proceedings dated March 19, 2015. Disability Rights Washington 315 5<sup>th</sup> Avenue South, Suite 850 DECLARATION OF EMILY COOPER IN SUPPORT OF PLAINTIFFS' MOTION TO RECONSIDER SCOPE OF INJUNCTION REGARDING IN-JAIL Seattle, Washington 98104 **EVALUATIONS - 1** (206) 324-1521 · Fax: (206) 957-0729

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5. Attached as Exhibit D is a true and accurate copy of an excerpt of the Verbatim Report of Proceedings dated March 17, 2015.

- 6. Attached as Exhibit E is a true and accurate copy of an excerpt of the Verbatim Report of Proceedings dated March 18, 2015.
- 7. Attached as Exhibit F is a true and accurate copy of an excerpt of the Verbatim Report of Proceedings dated March 23, 2015.
- 8. Attached as Exhibit G is a true and accurate copy of Defendants 2014 First Quarter Report to the Legislature.
- 9. Attached as Exhibit H is a true and accurate copy of Defendant's Trial Exhibit 200 depicting the "Number of Days From Order Signed to Completed Referral."

I declare under penalty of perjury under the laws of the United States and the State of Washington that the foregoing is true and correct and that this declaration was executed on June 2, 2016, at Seattle, Washington.

/s/ Emily Cooper
EMILY COOPER

**CERTIFICATE OF SERVICE** 

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DECLARATION OF EMILY COOPER IN SUPPORT OF PLAINTIFFS' MOTION TO RECONSIDER SCOPE OF INJUNCTION REGARDING IN-JAIL EVALUATIONS - 3 C14-01178-MJP

I hereby certify that on June 2, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Nicholas A Williamson (<u>NicholasW1@atg.wa.gov</u>) Sarah Jane Coats (<u>sarahc@atg.wa.gov</u>) Amber Lea Leaders (<u>amberl1@atg.wa.gov</u>)

DATED: June 2, 2016 at Seattle, Washington.

/s/La Rond Baker

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