

THE HON. MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

A.B., by and through her next friend CASSIE
CORDELL TRUEBLOOD, *et al.*,

Plaintiffs,

v.

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

Defendants.

No. 14-cv-01178-MJP

DECLARATION OF EMILY COOPER IN
SUPPORT OF PLAINTIFFS' MOTION FOR
TEMPORARY RESTRAINING ORDER

I, Emily Cooper, declare as follows:

1. I am over the age of eighteen, am counsel for Plaintiffs, have personal knowledge of the matters stated herein, and am competent to testify thereto.

2. Attached as Exhibit A is a true and accurate copy of a table of Department of Social and Human Services ("DSHS") response to Dr. Pinal's concerns with Dr. Pinal's replies to those comments.

3. Attached as Exhibit B is a true and accurate copy of the transcript of the March 10, 2016, status conference before the Honorable Marsha Pechman.

4. Attached as Exhibit C is a true and accurate copy of DSHS' Draft Revised Long Term Plan submitted on March 15, 2016.

1 5. Attached as Exhibit D is a true and accurate copy of Plaintiffs' letter of concerns
2 dated July 27, 2015, and sent to Dr. Danna Mauch and Defendants regarding Defendants'
3 compliance.

4 6. Attached as Exhibit E is a true and accurate copy of Plaintiffs' letter of concern
5 dated March 2, 2016, and sent to Dr. Danna Mauch and Defendants regarding the Yakima
6 County Correctional Complex ("YCCC").

7 7. Attached as Exhibit F is a true and correct copy of Plaintiffs' Trial Exhibit 35.

8 8. Attached as Exhibit G is a true and correct copy of the Washington State
9 Department of Corrections' "Use of Yakima County Corrections Center Report" to the
10 Washington Legislature, dated December 1, 2014 (available at:
11 [http://app.leg.wa.gov/ReportsToTheLegislature/Home/GetPDF?fileName=Yakima%20County%](http://app.leg.wa.gov/ReportsToTheLegislature/Home/GetPDF?fileName=Yakima%20County%20Jail%20Facility_8740630c-bcc0-4543-8130-06e77e1d1f8f.pdf)
12 [20Jail%20Facility_8740630c-bcc0-4543-8130-06e77e1d1f8f.pdf](http://app.leg.wa.gov/ReportsToTheLegislature/Home/GetPDF?fileName=Yakima%20County%20Jail%20Facility_8740630c-bcc0-4543-8130-06e77e1d1f8f.pdf)).

13 9. Attached as Exhibit H is a true and correct copy of the Seattle Times article,
14 "'Contract Inmates' Leaving Yakima County Jail," dated January 9, 2011 (available at
15 <http://www.seattletimes.com/seattle-news/contract-inmates-leaving-yakima-county-jail>).

16 10. Attached as Exhibit I is a true and correct copy of the Yakima Herald Article
17 "Yakima County Jail Set to Make Transition to Mental Health Facility," dated December 16,
18 2015 (available at [http://www.yakimaherald.com/news/local/yakima-county-jail-set-to-make-](http://www.yakimaherald.com/news/local/yakima-county-jail-set-to-make-transition-to-mental-health/article_2cbe6fb4-a3c5-11e5-8041-4b8e3fe7debe.html)
19 [transition-to-mental-health/article_2cbe6fb4-a3c5-11e5-8041-4b8e3fe7debe.html](http://www.yakimaherald.com/news/local/yakima-county-jail-set-to-make-transition-to-mental-health/article_2cbe6fb4-a3c5-11e5-8041-4b8e3fe7debe.html)).

20 11. Attached as Exhibit J is a true and correct copy of the February 24, 2016,
21 Psychiatric Systems Consultation Report of Debra A. Pinals.

22 12. Attached as Exhibit K is a true and correct copy of the KIMAtv article "Yakima
23 Jail Finds New Use After Sitting Empty for Five Years," dated December 16, 2015 (available at

1 <http://kimatv.com/news/local/yakima-county-empty-jail-space-rented-out-to-program-for->
2 [inmate-mental-health-treatment](http://kimatv.com/news/local/yakima-county-empty-jail-space-rented-out-to-program-for-inmate-mental-health-treatment)).

3 13. Attached as Exhibit L is a true and correct copy of Defendants' letter dated
4 November 25, 2015, and attached supporting documents responding to Plaintiffs' concerns.

5 I declare under penalty of perjury under the laws of the United States and the State of
6 Washington that the foregoing is true and correct and that this declaration was executed on
7 March 17, 2016, at Seattle, Washington.

8 /s/ Emily Cooper

9 EMILY COOPER, WSBA No. 34406

CERTIFICATE OF SERVICE

I hereby certify that on March 17, 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 (NicholasW1@atg.wa.gov)
- Sarah Jane Coats (sarahc@atg.wa.gov)
- Amber Lea Leaders (amberl1@atg.wa.gov)

DATED: March 17, 2016, at Seattle, Washington

/s/ La Rond Baker
La Rond Baker, WSBA No. 43610

Attorney for Plaintiffs