

THE HON. MARSHA J. PECHMAN

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23

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' REPLY IN  
SUPPORT OF THE 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 the March 20, 2015, expert consultant report written by Dr. Debra Pinals and Andrew Phillips.
3. Attached as Exhibit B is a true and accurate copy of the January 25, 2016, evidentiary hearing transcript with the Honorable Marsha Pechman.
4. Attached as Exhibit C is a true and accurate copy of the Department of Social and Health Services ("DSHS") February 27, 2016, submission the Court Monitor regarding staffing.
5. Attached as Exhibit D is a true and accurate copy of Andrew Phillips curriculum vitae.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23

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 March 24, 2016, at Seattle, Washington.

/s/ Emily Cooper  
EMILY COOPER

**CERTIFICATE OF SERVICE**

I hereby certify that on March 24, 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](mailto:NicholasW1@atg.wa.gov))
- Sarah Jane Coats ([sarahc@atg.wa.gov](mailto:sarahc@atg.wa.gov))
- Amber Lea Leaders ([amberl1@atg.wa.gov](mailto:amberl1@atg.wa.gov))

DATED: March 24, 2016 at Seattle, Washington.

/s/Mona Rennie  
Legal Assistant

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23