

THE HON. MARSHA J. PECHMAN

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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 TO EXTEND THE
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 April 8, 2016, evidentiary hearing transcript with the Honorable Marsha Pechman.
- 3. Attached as Exhibit B is a true and accurate copy of the April 20, 2016, email from Assistant Attorney General Sarah Coats.
- 4. Attached as Exhibit C is a true and accurate copy of the Court Monitor’s April 22, 2016 report regarding the Yakima facility’s seclusion and restraint policy.

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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 April 22, 2016, at Seattle, Washington.

/s/ Emily Cooper
EMILY COOPER

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CERTIFICATE OF SERVICE

I hereby certify that on April 22, 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: April 22, 2016 at Seattle, Washington.

/s/Christopher Carney