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The Honorable MARSHA J. PECHMAN

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

CASSIE CORDELL TRUEBLOOD, next  
friend of A.B., an incapacitated person, et al.,

Plaintiffs,

v.

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

Defendants.

NO. 2:14-cv-1178 MJP

DEFENDANTS’ RESPONSE TO  
PLAINTIFFS’ MOTION TO  
EXTEND THE TEMPORARY  
RESTRAINING ORDER

While Defendants do not contest Plaintiffs’ Motion to Extend the Temporary Restraining Order (“TRO”), they are submitting this Response to correct factual assertions in Plaintiffs’ Motion concerning their compliance with the TRO. Plaintiffs state that the Defendants have failed “to produce proof of compliance regarding . . . the risks posed to class members due to the open stairwell” and “to obtain the Court Monitor’s approval of the seclusion and restraint policy” for the Yakima County Competency Restoration Program (YCCRP). Dkt. #222 at 3. Defendants submit this declaration of Carla Reyes, assistant secretary for the Behavioral Health Administration, to provide the Court with information concerning the Defendants’ progress

1 concerning compliance with the TRO including the mitigation efforts made by the Department  
2 since the April 8, 2016 status conference.

3 WHEREFORE the Defendants submit the Declaration of Carla Reyes, with Exhibits  
4 A-E, for the Court's and Plaintiffs' consideration.

5 RESPECTFULLY SUBMITTED this 25th day of April 2016.

6 ROBERT W. FERGUSON  
7 Attorney General

8  
9 /s Sarah J. Coats  
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**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 23 day of April 2016, 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)

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

Dated this 23 day of April 2016, at Olympia, Washington.

  
\_\_\_\_\_  
Beverly Cox  
Legal Assistant

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