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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.

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

Defendants.

NO. C14-1178 MJP

DEFENDANTS' REQUEST FOR  
PARTIAL TERMINATION OF  
TEMPORARY RESTRAINING  
ORDER

As ordered in the Court's May 10, 2016, Extension of the Temporary Restraining Order (Dkt. # 238), the Department of Social and Health Services respectfully submits proof of compliance regarding the seclusion and restraint room at the Yakima Competency Restoration Program. Attached is a declaration from Rick Weaver, CEO of Comprehensive Mental Health, detailing the changes made. Defendants request that the portion of the temporary restraining order restricting use of the seclusion and restraint room at the Yakima Competency Restoration Program be lifted immediately based on compliance with the order.

RESPECTFULLY SUBMITTED this 16th day of May 2016.

ROBERT W. FERGUSON  
Attorney General

/s/Amber L. Leaders  
SARAH J. COATS, WSBA No. 20333  
AMBER L. LEADERS, WSBA No. 44421  
NICHOLAS A. WILLIAMSON, WSBA No. 44470

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Assistant Attorneys General  
Attorneys for Defendants  
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PO Box 40124  
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(360) 586-6565

**CERTIFICATE OF SERVICE**

*Amber L. Leaders*, 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 16th day of May, 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)

Emily Cooper: [emilyc@dr-wa.org](mailto:emilyc@dr-wa.org)

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Kenan Isitt: [Kenan.isitt@cgilaw.com](mailto:Kenan.isitt@cgilaw.com)

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

Dated this 16th day of May 2016 at Olympia, Washington.

/s/Amber L. Leaders  
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