

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

DECLARATION OF
SUSAN COPELAND

I, Susan Copeland, am over the age of 18 years of age, competent to testify to the matters below, and declare based upon personal knowledge:

1. I am the Residential Services Manager at Maple Lane Competency Restoration Program (Maple Lane) which provides competency restoration services. I am an employee of the Department of Social and Health Services (DSHS). As Residential Services Manager, my duties include managing a team of 36 staff, including Residential Rehabilitation Counselors, Security Guards and a Security Guard Supervisor. I ensure that these staff members are following the therapeutic programming and structure put in place by Correct Care Recovery Solutions (CCRS), the contracted clinical team for Maple Lane. I also oversee all of the facility operations for DSHS at Maple Lane, including coordinating with Consolidated Maintenance

1 Operations, which provides on-site maintenance for the facility and delivers all meals and
2 laundry daily.

3 2. On June 6, 2016, I learned of the Court's Order Granting Motion for Temporary
4 Restraining Order at Maple Lane. I was informed by Dr. Thomas Kinlen, Director of the Office
5 of Forensic Mental Health Services, of the Court's order, and based on that Order, Dr. Kinlen
6 directed that access to the second floor of Wings B, C, and D be restricted, effective
7 immediately¹. At the time of the Order, no patients were housed on Wings B, C, or D and
8 therefore no patients needed to be moved to the first floor. In addition to restricting access, we
9 immediately sought to secure temporary materials to construct barriers at the foot of each of
10 these stairwells, which have been installed today. Until those materials were installed, the
11 stairwells were blocked off with caution tape and signage. In addition to these barriers, staff
12 members are monitoring the stairwells to ensure they are not accessed by patients. At this time,
13 access and use of the second floor of Wings B, C, and D by patients at Maple Lane is prohibited.


14 3. Since filing its response to Plaintiffs' Motion for Temporary Restraining Order
15 on May 21, 2016, DSHS continued to work on the remediation efforts on the stairwells and
16 railings for Wings B, C, and D at Maple Lane. When the Court issued its Order on June 6,
17 remediation efforts to Wings B, C, and D had been completed. The construction to enclose the
18 railings and stairwells in the same manner as Wing A was completed on June 6, 2016.

19 4. On June 7, 2016, I took photographs of the completed remediation work on Wings
20 B, C, and D. I also took photographs of the temporary barriers erected to seal off access to Wings
21 B, C, and D. Attached to this declaration are true and correct copies of the photographs of these
22 three stairwells and the temporary barriers erected. Attachment A.

23
24
25 ¹ There are staff offices and miscellaneous supplies located on the second floor of Wings B, C, and D.
26 Access and use to these Wings is prohibited for patients, but Maple Lane staff continues to access these spaces as necessary.

1 Pursuant to 28 USC § 1746(2), I declare under penalty of perjury that the foregoing is
2 true and correct.

3 Executed on June 7th, 2016 at Centralia, Washington.

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6 SUSAN COPELAND
7 Residential Services Manager
8 Maple Lane Competency Restoration Program
9 Office of Forensic Mental Health Services
10 Department of Social and Health Services
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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 7th day of June 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: davidec@dr-wa.org

Emily Cooper: emilyc@dr-wa.org

Anna Catherine Guy: annag@dr-wa.org

La Rond Baker: lbaker@aclu-wa.org

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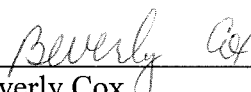
Christopher Carney: Christopher.Carney@CGILaw.com

Sean Gillespie: Sean.Gillespie@CGILaw.com

Kenan Lee Isitt: 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 7th day of June 2016, at Olympia, Washington.


Beverly Cox
Legal Assistant

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