

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

DONALD BANGO and SCOTT BAILEY,  
individually and on behalf of all others  
similarly situated;

Plaintiffs,

v.

PIERCE COUNTY, WASHINGTON; BRUCE  
DAMMEIER, in his official capacity as Pierce  
County Executive; PIERCE COUNTY SHERIFF'S  
DEPARTMENT; PAUL A. PASTOR, in his official  
capacity as Pierce County Sheriff; PATTI  
JACKSON-KIDDER, in her official capacity as  
the Pierce County Chief of Corrections; JANET  
RHOTON, in her official capacity as the Pierce  
County Jail Mental Health Manager, and their  
officers, agents, employees, and successors;

Defendants.

NO. 3:17-cv-06002

DECLARATION OF SALVADOR A. MUNGIA  
IN SUPPORT OF MOTION FOR CLASS  
CERTIFICATION

NOTED FOR: JANUARY 26, 2018

ORAL ARGUMENT REQUESTED

Pursuant to 28 U.S.C. § 1746, I, Salvador A. Mungia, declare and state as follows.

1           1.     I was admitted to practice law in the State of Washington in 1984. I am  
2 partner with the law firm of Gordon, Thomas, Honeywell where I have practiced since  
3 1986. I am counsel of record for Plaintiffs in this case.

4           2.     I graduated with honors from Georgetown University Law Center in 1984. I  
5 am admitted to practice before this Court, the U.S. District Court for the Eastern District of  
6 Washington, the U.S. Court of Appeals for the Ninth Circuit, and the U.S. Supreme Court.

7           3.     I have been rated AV Premium by Martindale-Hubbell for over ten years. I  
8 have been listed in "The Best Lawyers in America" for over five years. I am a member of  
9 the American Board of Trial Advocates.

10          4.     I was one of the lead attorneys in the 1995 lawsuit against Pierce County  
11 representing inmates who had claims arising out of the conditions and treatment at the  
12 Pierce County jail. The plaintiffs in that lawsuit moved for class certification for the then-  
13 current and for future inmates of the Pierce County jail. This Court granted the motion for  
14 class certification.

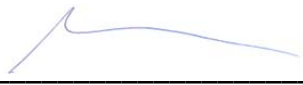
15          5.     Ms. Janelle Chase-Fazio is an associate with Gordon Thomas Honeywell.  
16 She graduated from the University of Washington School of Law in 2016 with honors and  
17 joined Gordon Thomas Honeywell that same year. Ms. Chase-Fazio is admitted to practice  
18 law in Washington State and in this court.

19          6.     In cooperation with the ACLU-WA, Gordon Thomas Honeywell has the  
20 capacity to thoroughly and vigorously litigate the claims in this case and properly  
21 represent the plaintiff class. Gordon Thomas Honeywell will commit all necessary  
22 resources to do so. If appointed class counsel Ms. Chase-Fazio and I will ensure that we  
23 zealously represent the interests of the class to the best of our collective ability.  
24  
25  
26

1 I DECLARE UNDER PENALTY OF PREJURY UNDER THE LAW OF THE UNITED STATES  
2 OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

3 Signed this 21<sup>st</sup> day of December, 2017, in Tacoma, Washington.

4  
5 By

  
\_\_\_\_\_  
Salvador A. Mungia, WSBA No. 14807  
[smungia@gth-law.com](mailto:smungia@gth-law.com)