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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

ROGELIO MONTES and MATEO
ARTEAGA,

Plaintiffs,

v.

CITY OF YAKIMA, MICAH
CAWLEY, in his official capacity as
Mayor of Yakima, and MAUREEN
ADKISON, SARA BRISTOL,
KATHY COFFEY, RICK ENSEY,
DAVE ETTL, and BILL LOVER, in
their official capacity as members of
the Yakima City Council,

Defendants.

NO. 12-CV-3108 TOR

**DECLARATION OF ABHA
KHANNA IN SUPPORT OF
MOTION FOR ENTRY OF
PLAINTIFFS' PROPOSED
REMEDIAL PLAN AND FINAL
INJUNCTION**

DECLARATION OF A. KHANNA
IN SUPPORT OF PLS.' REMEDIAL
PLAN AND INJUNCTION

LEGAL123680203.1

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1 I, Abha Khanna, hereby declare:

2 I am a counsel with the law firm of Perkins Coie LLP and one of the
3 attorneys for Plaintiffs in the above-captioned matter. I am over the age of 18
4 and am competent to testify.
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6
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8 1. On September 11, 2014, counsel for Plaintiffs and counsel for
9 Defendants engaged in a telephone conference to discuss the issue of proposed
10 remedial plans.
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14 2. On September 23, the parties exchanged their respective proposed
15 remedial plans.
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18 3. On September 25, counsel for both parties met in person at the
19 offices of Perkins Coie, LLP in Seattle to discuss their respective proposed
20 remedies and injunctions. It was determined that the parties could not agree on
21 a proposed remedial plan or proposed injunction and that they would file
22 separate proposals with the Court.
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28 4. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiffs'
29 Illustrative Plan 1, including a map and relevant data. Upon the Court's
30 request, Plaintiffs will provide any and all back-up data required to generate
31 Illustrative Plan 1.
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36 5. Attached hereto as Exhibit 2 is a true and correct copy of the
37 Report on Remedy of Richard L. Engstrom, Ph.D., dated October 3, 2014.
38
39

40 6. Attached hereto as Exhibit 3 is a true and correct copy of the Third
41 Supplemental Declaration of William S. Cooper, dated October 1, 2014.
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44 7. Attached hereto as Exhibit 4 is a true and correct copy of the
45 Expert Report of John Alford, Ph.D. filed in *Benavidez v. Irving Independent*
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47

DECLARATION OF A. KHANNA
IN SUPPORT OF PLS.' REMEDIAL
PLAN AND INJUNCTION - 2

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1 *School District, No. 3:13-cv-0087 (N.D. Tex.) and dated July 24, 2013. I*
2
3 retrieved this report from the PACER website.
4

5
6 EXECUTED at Seattle, Washington this 3rd day of October, 2014.
7

8
9 s/ Abha Khanna

10 Abha Khanna, WSBA No. 42612

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DECLARATION OF A. KHANNA
IN SUPPORT OF PLS.' REMEDIAL
PLAN AND INJUNCTION - 3

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CERTIFICATE OF SERVICE

I certify that on October 3, 2014, I electronically filed the foregoing Declaration of Abha Khanna in Support of Motion for Entry of Plaintiffs' Proposed Remedial Plan and Final Injunction with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following attorney(s) of record:

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John Safarli WSBA 44056
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*Counsel for
Defendants*

☒ VIA CM/ECF
SYSTEM
☐ VIA FACSIMILE
☐ VIA MESSENGER
☐ VIA U.S. MAIL
☐ VIA EMAIL

I certify under penalty of perjury that the foregoing is true and correct.
DATED:

October 3, 2014

PERKINS COIE LLP

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DECLARATION OF A. KHANNA
IN SUPPORT OF PLS.' REMEDIAL
PLAN AND INJUNCTION - 4

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