

THE HON. MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

A.B., by and through her next friend CASSIE
CORDELL TRUEBLOOD, *et al.*,

Plaintiffs,

v.

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

Defendants.

No. 14-cv-01178-MJP

DECLARATION OF ANNA GUY IN
SUPPORT OF PLAINTIFFS' MOTION
FOR SUMMARY JUDGMENT

I, Anna Guy, declare as follows:

1. I am over the age of eighteen, have personal knowledge of the matters stated herein, and am competent to testify thereto.

2. I am licensed to practice law in Washington State. Since March 10, 2014, I have been employed as a Staff Attorney with Disability Rights Washington.

3. On October 28, 2014, I met with R.H. at Franklin County Jail. R.H. was booked on October 2, 2014 in connection with a charge of Assault in the Third Degree. Attached as Exhibit A is a true and accurate excerpt of the Franklin County Jail inmate roster.

4. Based on my attempt to interview him, R.H. appeared to have severe memory issues. He could not answer my questions regarding his name, how long he had been in the jail,

1 or whether he had an attorney. R.H. also stated he could not remember the names or faces of any
2 family members including whether family members had visited the jail.

3 5. R.H. reported constant head pain. He also reported blurry vision and told me he
4 sees white and orange balls of light.

5 6. When I met with R.H., I observed dark brown material on R.H.'s fingers and
6 hands. When I asked him what was on his hands, R.H. replied that it was his own feces. He
7 proceeded to lick the feces from his fingers and hands. I also observed R.H. marking the walls
8 with feces on his hands.

9 7. On the same day I met R.H., a court ordered him for competency evaluation.
10 Attached as Exhibit B is a true and accurate copy of the trial court's October 28, 2014 order for a
11 competency evaluation by Eastern State Hospital.

12 I declare under penalty of perjury under 28 U.S.C. § 1746, that the forgoing is true and
13 accurate.

14 DATED this 5th day of November, 2014, at Seattle, Washington.

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16 /s/ Anna Guy
ANNA GUY
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CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

- John K McIlhenny (JohnM5@atg.wa.gov)
- Nicholas A Williamson (NicholasW1@atg.wa.gov)
- Sarah Jane Coats (sarahc@atg.wa.gov)
- Amber Lea Leaders (amberl1@atg.wa.gov)

DATED: November 6, 2014 at Seattle, Washington.

/s/Mona Rennie

Legal Assistant, Disability Rights Washington