

THE HONORABLE MARSHA J. PECHMAN

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

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 EMILY COOPER  
IN SUPPORT OF PLAINTIFFS’  
MOTION FOR TEMPORARY  
RESTRAINING ORDER**

I, Emily Cooper, declare as follows:

1. I am over the age of eighteen, am counsel for Plaintiffs, have personal knowledge of the matters stated herein, and am competent to testify thereto.
2. Attached as Exhibit A is a true and correct copy of the May 16, 2016 letter sent by Assistant Attorney General Amber Leaders regarding Maple Lane.
3. Attached as Exhibit B is a true and correct copy of the Memorandum of Understanding between the Department of Social and Health Services (“DSHS”) and the Washington State Department of Corrections.

1 4. Attached as Exhibit C is a true and correct copy of a November 11, 2015 letter from  
2 Plaintiffs' Counsel regarding the November 9, 2015 Parties Meeting.

3 5. Attached as Exhibit D is a true and correct copy of the October 6, 2015 report of Dr.  
4 Debra Pinals.

5 6. Attached as Exhibit E is the November 17, 2015 Report of Dr. Debra Pinals.

6 7. Attached as Exhibit F is the February 1, 2016, DSHS Response to Dr. Pinals Maple Lane  
7 Report.

8 I declare under penalty of perjury under the laws of the United States and the State of  
9 Washington that the foregoing is true and correct and that this declaration was executed on May  
10 19, 2016, at Seattle, Washington.

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12 /s/ Emily Cooper  
Emily Cooper, WSBA No. 34406

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 19, 2016, 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:

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

DATED: May 19, 2016, at Seattle, Washington

*/s/La Rond Baker*  
\_\_\_\_\_  
La Rond Baker, WSBA No. 43610