1 THE HON. MARSHA J. PECHMAN 2 3 4 5 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 6 A.B., by and through her next friend CASSIE No. 14-cv-01178-MJP 7 CORDELL TRUEBLOOD, et al., 8 Plaintiffs. 9 **DECLARATION OF EMILY COOPER** v. IN SUPPORT OF PLAINTIFFS' 10 MOTION FOR TEMPORARY WASHINGTON STATE DEPARTMENT OF SOCIAL AND HEALTH SERVICES, et al., RESTRAINING ORDER 11 Defendants. 12 13 14 15 I, Emily Cooper, declare as follows: 16 1. I am over the age of eighteen, am counsel for Plaintiffs, have personal knowledge 17 of the matters stated herein, and am competent to testify thereto. 18 Attached as Exhibit A is a true and accurate copy of the Maple Lane Report 2. 19 submitted by Dr. Mauch and her experts on June 1, 2016. 20 3. Attached as Exhibit B is a true and accurate copy of the Maple Lane Report 21 submitted by Dr. Mauch and her experts on May 22, 2016. 22 4. Attached as Exhibit C is a true and accurate copy of Western State Hospital's 23 Treatment and Recovery Center (TRC) Guidelines. DECLARATION OF EMILY COOPER IN SUPPORT Disability Rights Washington

OF PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER - 1 C14-01178-MJP Disability Rights Washington 315 5<sup>th</sup> Avenue South, Suite 850 Seattle, Washington 98104 (206) 324-1521 · Fax: (206) 957-0729

Case 2:14-cv-01178-MJF	Document 262	Filed 06/03/16	Page 2 of 3
------------------------	--------------	----------------	-------------

I declare under penalty of perjury under the laws of the United States and the State of

/s/ Emily Cooper
EMILY COOPER

Washington that the foregoing is true and correct and that this declaration was executed on June

3, 2016, at Seattle, Washington.

DECLARATION OF EMILY COOPER IN SUPPORT OF PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER - 2 C14-01178-MJP

Disability Rights Washington 315 5<sup>th</sup> Avenue South, Suite 850 Seattle, Washington 98104 (206) 324-1521 · Fax: (206) 957-0729 1

2

3

4

5

67

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

## **CERTIFICATE OF SERVICE**

I hereby certify that on June 3, 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 (Nicholas W1@atg.wa.gov)
- Sarah Jane Coats (sarahc@atg.wa.gov)
- Amber Lea Leaders (amberl1@atg.wa.gov)

DATED: June 3, 2016 at Seattle, Washington.

/s/La Rond Baker

La Rond Baker

DECLARATION OF EMILY COOPER IN SUPPORT OF PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER - 3 C14-01178-MJP Disability Rights Washington 315 5<sup>th</sup> Avenue South, Suite 850 Seattle, Washington 98104 (206) 324-1521 · Fax: (206) 957-0729