

The Honorable MARSHA J. PECHMAN

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

CASSIE CORDELL TRUEBLOOD, next
friend of A.B., an incapacitated person, *et al.*,

Plaintiffs,

v.

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

Defendants.

NO. C14-1178 MJP

DEFENDANTS' REQUEST FOR
TERMINATION OF TEMPORARY
RESTRAINING ORDER

NOTE FOR MOTION CALENDAR:
JUNE 7, 2016

As ordered in the Court's June 6, 2016, Order Granting Motion for Temporary Restraining Order (Dkt. #263), the Department of Social and Health Services (Department) respectfully submits proof of compliance regarding the stairways in wings B, C, and D at the Maple Lane Competency Restoration Program. The remediation efforts for these three stairways have been completed, and stairways are now enclosed in the same manner as the stairway in wing A, which this Court stated "does not present an unreasonable risk of irreparable harm." Dkt. #263, at 4. Attached is a declaration from Susan Copeland, Residential Services Manager at Maple Lane, detailing the remediation efforts. Declaration of Susan Copeland ¶¶ 2-4. The Department respectfully requests that the temporary restraining order restricting use of wings B, C, and D at the Maple Lane Competency Restoration Program be immediately lifted.

1 RESPECTFULLY SUBMITTED this 7th day of June 2016.

2 ROBERT W. FERGUSON
3 Attorney General

4 /s/Amber L. Leaders

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CERTIFICATE OF SERVICE

Beverly Cox, states and declares as follows:

I am a citizen of the United States of America and over the age of 18 years and I am competent to testify to the matters set forth herein. I hereby certify that on this 7th day of June 2016, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

David Carlson: davide@dr-wa.org

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I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Dated this 7th day of June 2016, at Olympia, Washington.


Beverly Cox
Legal Assistant

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