

The Honorable Marsha J. Pechman

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

A.B., by and through her next friend Cassie Cordell Trueblood; D.D., by and through his next friend Andrea Crumpler; K.R., by and through his next friend Marilyn Roberts; Q.M., by and through his next friend Kathryn McCormick; all others similarly situated; and Disability Rights Washington;

Plaintiffs,

vs.

Washington State Department of Social and Health Services; Kevin Quigley, in his official capacity as Secretary of the Department of Social and Health Services; Western State Hospital; Ron Adler in his official capacity as Chief Executive Officer of Western State Hospital; Eastern State Hospital; and Dorothy Sawyer in her official capacity as Chief Executive Officer of Eastern State Hospital,

Defendants.

No. 14-cv-01178-MJP

**DECLARATION OF
CASSIE CORDELL TRUEBLOOD**

I, Cassie Cordell Trueblood, 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. I represent indigent criminal defendants as a public defender. I am employed by the Snohomish County Public Defender

1 Association (SCPDA), which represents the vast majority of indigent criminal defendants
2 prosecuted in Snohomish County, Washington.

3 3. I am the duly appointed attorney for A.B. I represent A.B. in connection with a
4 charge of Assault in the Third Degree. A.B. is alleged to have slapped a police officer, causing
5 no serious or lasting physical injury.

6 4. I am also A.B.'s next friend in this litigation. I am aware that this litigation is
7 being pursued as a class action. I am aware of my obligations, should this case be certified as a
8 class action and I be appointed as a class representative.

9 5. I know A.B. to suffer from severe mental illness. She is unable to hold a rational
10 conversation for more than a few seconds. While in Snohomish County Jail, A.B. declined to
11 take any medications, to wash herself, or to otherwise protect her most basic survival needs.

12 6. A.B. was put in Snohomish County Jail on July 2, 2014. From July 2, 2014 to
13 August 8, then again from August 20 to August 22, 2014, A.B. was held in a solitary
14 confinement cell in Snohomish County Jail pending transportation to Western State Hospital
15 (WSH) for competency restoration treatment. From August 11 to August 20, 2014, she was held
16 in the emergency room of Providence Hospital, Colby Campus.

17 7. Attached to the Declaration as Exhibit A is a true and accurate copy of
18 Defendants' official report on A.B.'s mental condition, finding that she is legally incompetent.

19 8. Attached to this Declaration as Exhibit B is a true and accurate copy of the trial
20 court's July 2, 2014 order requiring Defendants to transport A.B. for competency restoration
21 treatment at WSH.

22 9. Attached to this Declaration as Exhibit C is a true and accurate copy of Dr. Brian
23 Waiblinger's sworn declaration, dated July 30, 2014, regarding the timeline for transporting A.B.

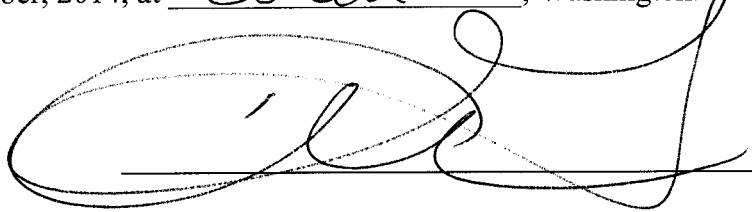
1 to WSH for competency restoration treatment. Dr. Waiblinger is the Medical Director for
2 Western State Hospital.

3 10. Attached to this Declaration as Exhibit D is a true and accurate copy of Brian
4 Waiblinger's July 25, 2014 sworn testimony regarding Defendants' policies for transporting and
5 treating legally incompetent patients.

6 11. A.B. was finally transported to Western State Hospital on August 22, 2014.

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

9 DATED this 1st day of October, 2014, at Everett, Washington.

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12 CASSIE CORDELL TRUEBLOOD
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CERTIFICATE OF SERVICE

I hereby certify that on October 3, 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: October 3, 2014, at Seattle, Washington.

/s/Mona Rennie

Legal Assistant
Disability Rights Washington