

FILED
SUPREME COURT
STATE OF WASHINGTON
6/24/2020 8:00 AM
BY SUSAN L. CARLSON
CLERK

No. 98317-8

SUPREME COURT OF THE STATE OF WASHINGTON

SHYANNE COLVIN, SHANELL DUNCAN, TERRY KILL, LEONDIS
BERRY, and THEODORE ROOSEVELT RHONE,

Petitioners,

v.

JAY INSLEE, Governor of the State of Washington, and STEPHEN
SINCLAIR, Secretary of the Washington State Department of Corrections,

Respondents.

**PETITIONERS' MOTION TO ACCELERATE REVIEW AND
THIRD MOTION TO SUPPLEMENT PETITIONERS' RECORD IN
SUPPORT OF PETITION FOR A WRIT OF MANDAMUS**

Nicholas Allen, WSBA #42990
Nicholas B. Straley, WSBA #25963
Janet S. Chung, WSBA #28535
Kimberlee Gunning, WSBA #35366
COLUMBIA LEGAL SERVICES
101 Yesler Way, Suite 300
Seattle, WA 98104
Telephone: (206) 464-1122
Attorneys for Petitioners

I. IDENTITIES OF MOVING PARTIES

Petitioners Shyanne Colvin, Shanell Duncan, Terry Kill, Leondis Berry, and Theodore Roosevelt Rhone ask the Court to accelerate consideration of this motion and to grant their motion to supplement the record with additional relevant evidence described below.

II. RELIEF REQUESTED

Pursuant to RAP 9.11 and other applicable rules, Petitioners seek leave of the Court to supplement the record with two declarations that include relevant information that will assist the Court in its consideration of the issues presented in this action. The Petitioners ask the Court to consider the following additional declarations:

PSD 735-737 Declaration of Abdullahi Noor
PSD 738-739 Declaration of Andres Ferrer
PSD 740-742 Declaration of Jason Streiff

Petitioners also ask the Court to accelerate review of this motion.

III. REASONS WHY RELIEF SHOULD BE GRANTED

The declarations filed along with this motion are declarations from three individuals, Abdullahi Noor, Andres Ferrer, and Jason Streiff,

currently in Department of Corrections (DOC) custody and incarcerated at Coyote Ridge Corrections Center (CRCC).

These declarations provide the Court with additional information on current conditions at CRCC resulting from DOC's attempts to address the outbreak of the COVID-19 virus at CRCC.

IV. CONCLUSION

The Court should grant Petitioners' motion to supplement the record and consider the relevant information contained in the declarations filed with this motion.

RESPECTFULLY SUBMITTED this 23rd day of June, 2020.

COLUMBIA LEGAL SERVICES

s/ Nicholas Allen

Nicholas Allen, WSBA #42990
Nicholas B. Straley, WSBA #25963
Janet S. Chung, WSBA #28535
Kimberlee Gunning, WSBA #35366
101 Yesler Way, Suite 300
Seattle, WA 98104
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CERTIFICATE OF SERVICE

CLERK I certify that on June 23, 2020, I electronically filed the following documents:

- Petitioners' Motion to Submit Additional Evidence in Support of Petition for Writ of Mandamus, to Expedite Review, and Motion for Appointment of ER 706 Expert
- Declaration of Nicholas B. Allen in Support of Petitioners' Motion to Submit Additional Evidence in Support of Petition for Writ of Mandamus, to Expedite Review, and Motion for Appointment of ER 706 Expert
- Declaration of Abdullahi Noor
- Declaration of Andres Ferrer
- Declaration of Jason Streiff
- Petitioners' Motion for Leave to File Over-length Motion to Submit Additional Evidence in Support of Petition for Writ of Mandamus, to Expedite Review, and Motion for Appointment of ER 706 Expert
- Petitioners' Motion to Accelerate Review and Third Motion to Supplement Petitioners' Record in Support of Petition for A Writ of Mandamus
- Petitioners' Third Supplemental Revised Index of Petitioners' Set of Documents Submitted for the Record

These documents were filed with the Clerk of the Court using the electronic filing system, which will send notification of filing to all parties of record at their email addresses as follows:

DAdreBCunningham@gmail.com
John.Samson@atg.wa.gov
PCpatcecf@piercecountywa.gov
andrea@smithalling.com
caedmonc@gmail.com
changro@seattleu.edu
correader@atg.wa.gov
cwallace@perkinscoie.com
dadre@defensenet.org
djohnson@paulweiss.com
dkimballstanley@paulweiss.com
dvasquez@karrtuttle.com
heatherm@dr-wa.org
hhatrup@karrtuttle.com

hsebens@co.skagit.wa.us
janet.chung@columbialegal.org
jaufderh@co.kitsap.wa.us
jmidgley@aclu-wa.org
jstarr@perkinscoie.com
kcpaciv@co.kitsap.wa.us
leeme@seattleu.edu
ltsuji@perkinscoie.com
mmc@smithalling.com
nblock@co.skagit.wa.us
nf@neilfoxlaw.com
nick.allen@columbialegal.org
nick.straley@columbialegal.org
nikkita.oliver@gmail.com
pleadings@aclu-wa.org
rachaels@dr-wa.org
rtyler@perkinscoie.com
sbuergel@paulweiss.com
talner@aclu-wa.org
tdavis@aclu-wa.org
teresa.chen@piercecountywa.gov
tim.lang@atg.wa.gov

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

EXECUTED this 23rd day of June, 2020, at Tacoma, Washington.

s/ Maureen Janega
MAUREEN JANEGA, Paralegal
Columbia Legal Services
101 Yesler Way, Suite 300
Seattle, WA 98104
206-287-9662
maureen.janega@columbialegal.org

COLUMBIA LEGAL SERVICES, INSTITUTIONS PROJECT

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Transmittal Information

Filed with Court: Supreme Court
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Appellate Court Case Title: Shyanne Colvin et al. v. Jay Inslee et al.

The following documents have been uploaded:

- 983178_Affidavit_Declaration_20200623181026SC274627_4678.pdf
This File Contains:
Affidavit/Declaration - Other
The Original File Name was 20 0622 Abdullahi Noor declaration.FINAL.pdf
- 983178_Motion_20200623181026SC274627_3302.pdf
This File Contains:
Motion 1 - Accelerate Review
The Original File Name was 20 06 23 Mot for accel review and to supp. record.FINAL.pdf
- 983178_Other_20200623181026SC274627_5565.pdf
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Other - 3rd Supp. Revised Index to Clerk's Records
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- John.Samson@atg.wa.gov
- PCpatcecf@piercecountywa.gov
- alex.bergstrom@columbialegal.org
- ali.bilow@columbialegal.org
- andrea@smithalling.com
- brandy.sincyr@columbialegal.org
- caedmon.cahill@seattle.gov
- changro@seattleu.edu
- cheli.bueno@columbialegal.org
- cindy.bourne@pacificlawgroup.com
- correader@atg.wa.gov
- cwallace@perkinscoie.com
- dadre@defensenet.org
- dawn.taylor@pacificlawgroup.com
- denise@aysattorneys.com
- djohnson@paulweiss.com
- dkimballstanley@paulweiss.com
- dvasquez@karrtuttle.com
- elizabeth.hendren@gmail.com
- elizabethh@nwjustice.org
- evangeline@aysattorneys.com
- greg@seaemplaw.com
- hannah.woerner@columbialegal.org
- heatherm@dr-wa.org
- hhatrup@karrtuttle.com
- hsebens@co.skagit.wa.us

- jamie.lisagor@pacificallawgroup.com
- janet.chung@columbialegal.org
- jaufderh@co.kitsap.wa.us
- jmidgley@aclu-wa.org
- jstarr@perkinscoie.com
- julia.bladin@columbialegal.org
- kcpaciv@co.kitsap.wa.us
- laurel.simonsen@columbialegal.or
- leeme@seattleu.edu
- ltsuji@perkinscoie.com
- matthew.segal@pacificallawgroup.com
- mmc@smithalling.com
- nblock@co.skagit.wa.us
- nf@neilfoxlaw.com
- nick.straley@columbialegal.org
- nikkita.oliver@gmail.com
- pamloginsky@waprosecutors.org
- pleadings@aclu-wa.org
- rachael@dr-wa.org
- riddhi@svlawcenter.org
- rtyler@perkinscoie.com
- sara@seaemplaw.com
- sbuergel@paulweiss.com
- talner@aclu-wa.org
- tdavis@aclu-wa.org
- teresa.chen@piercecountywa.gov
- tim.lang@atg.wa.gov
- tony.gonzalez@columbialegal.org

Comments:

Sender Name: Maureen Janega - Email: maureen.janega@columbialegal.org

Filing on Behalf of: Nicholas Brian Allen - Email: nick.allen@columbialegal.org (Alternate Email: nick.allen@columbialegal.org)

Address:

Columbia Legal Services, Institutions Project
101 Yesler Way, Suite 300
Seattle, WA, 98104
Phone: (206) 287-9662

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