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SUPREME COURT  
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6/24/2020 8:00 AM  
BY SUSAN L. CARLSON  
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No. 98317-8

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**SUPREME COURT OF THE STATE OF WASHINGTON**

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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.*

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**DECLARATION OF ABDULLAHI NOOR**

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**PSD-000735**

I, Abdullahi Noor, do hereby certify and declare as follows:

1. I am an inmate at Coyote Ridge Corrections Center in Connell, Washington. My DOC # is 393678. I was born in 1983 in Somalia. I was a child when the civil war broke out and saw my mother shot and killed in front of me at my aunt's house in Mogadishu. My aunt and I fled to Kenya, where I lived in refugee camps. Finally, I came to the United States and became a United States citizen.

2. In 2016, I was sentenced to a minimum term of 172 months in prison for second degree rape. I lost my appeal and have filed a Personal Restraint Petition in the Court of Appeals. COA No. 80891-5-I. When the COVID-19 pandemic broke out, I was afraid that I would get sick inside Coyote Ridge and filed an emergency motion in the PRP case for release under RAP 16.15(b). Unfortunately, on April 24, 2020, the Court of Appeals denied the motion because the State had not yet even responded to the PRP.

3. Conditions in Coyote Ridge are currently horrendous. Because COVID-19 is spreading through the prison, since May 29<sup>th</sup> we were locked down 23 hours a day. Since June 11<sup>th</sup>, I have been locked down in my cell 23.5 hours a day. I share the cell with three other people with no bathroom and no inside water. In the half hour that I am let out of my cell, I have to shower, use the toilet, make phone calls, use the microwave and get more water and ice. I have not been outside in fresh air since May 29<sup>th</sup>. I have not had any exercise at all.

4. Food is brought to us in the cell three times a day. We are supposed to get two hot meals a day but by the time the food comes it is cold. We get two or three small bottles of water in the cell during the whole day. If I need more water to drink or to wash myself before prayers, I need to get the water during the ½ hour that I am allowed out of my cell.

5. Inside the cell, there is no social distancing possible at all. The cell is very small with two sets of bunk beds with a table in between the bunks.

6. One time a day, someone from medical comes by and takes our temperature. I have not seen a doctor since April. I have back problems and some leg problems, but I have not had any medical care for these issues in months.

7. My cell lacks a toilet and a sink. The toilets and sinks are located outside on the tier. If I need to go to the toilet during the day, I must put a sign on the cell door and wait for someone to escort me to the bathroom. During the day, this can take up to 45 minutes, and one day last week it took almost three hours before someone came to take me to the bathroom. At nighttime, when we are sleeping, it can take sometimes up to an hour.

8. Between those limited times to access a toilet, there are times when I cannot help myself and I have to urinate into a small coffee bottle. Sometimes I have filled up two bottles with urine and I have to empty them in the toilet when I get to it, and clean them out so I can use the bottles again. Other times I have had to urinate in my clothing. At night, I can't turn on the lights because others are sleeping, so when I've tried to urinate into the bottle, I have soiled

myself. The other three people in the cell have done the same thing. One of my cellmates has been sick with cancer and he has defecated on himself and I can smell it. The smell in the cell is very bad.

9. I am a devout Muslim and must, by obligation, pray five times a day. In order to perform the prayer ritual, Muslims must be clean and wear good clothes before they present themselves before God. I have to make ablution and wash my hands, face and legs in order to pray. I cannot do this if I have soiled my clothing or do not have to fresh water during the day. When I have complained about this, I have been told that no one cannot help me.

10. In mid-May, I had two cell mates who got sick and were taken out of the cell and taken to another prison. We were not told whether they had COVID or not. I have never tested to see if I am positive.

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

I cannot sign this document as I am in Connell, Washington, and my lawyer is in Seattle, but it has been read to me and I consent to him signing it on my behalf.

DATED this 16<sup>th</sup> day of June 2020 at Connell Washington.

  
Abdullahi Noor

# COLUMBIA LEGAL SERVICES, INSTITUTIONS PROJECT

June 23, 2020 - 6:15 PM

## Transmittal Information

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**Appellate Court Case Number:** 98317-8  
**Appellate Court Case Title:** Shyanne Colvin et al. v. Jay Inslee et al.

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