

FILED
SUPREME COURT
STATE OF WASHINGTON
6/24/2020 8:00 AM
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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.

DECLARATION OF ANDRES FERRER

Nicholas Allen, WSBA #42990
Nicholas B. Straley, WSBA #25963
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Attorneys for Petitioners

I, Andres Ferrer, do hereby certify and declare as follows:

1. I am an inmate at Coyote Ridge Corrections Center in Connell, Washington. I am 45 years old. My DOC # is 418769. I am serving a 50 month sentence for domestic violence assault and felony harassment. My custody level is "camp eligible" and I understand that I should have been transferred to camp about two months go.

2. Conditions in Coyote Ridge are currently horrendous. Because COVID-19 is spreading through the prison, I am locked down in my cell 23.5 hours a day. I share the cell with one other person. I am let out of my cell for ½ hour a day in which I have to shower, make phone calls, get water and ice, use the microwave and clean my cell. I have not been outside in fresh air for one and a half months.

3. My cell has a toilet and a sink, but the water quality from the sink is bad. It is lukewarm, cloudy and tastes bad. I ordinarily would not drink it because it doesn't seem safe, but we have no choice as the filtered water and ice are in the common areas to which I don't have access during the day.

4. Food is brought to us in the cell. The supposedly hot food is cold by the time we get it.

5. An older person who was housed four cells away from mine was taken out of the cell on a gurney due to respiratory issues. Officers handcuffed his cellmate while they were trying to help the man. The medic and correctional officers were giving the man CPR without wearing personal protective equipment. I heard a medic say that it was COVID but we were told us later it was not, but we have no idea as to what is truly the case.

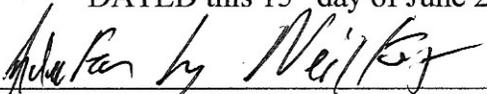
6. I am very worried about my long term health and mental health. I do not know what the long-term effects are of being locked into a cell for 23.5 hours a day without access to fresh air, without access to hot food, without access to fresh water and without exercise.

I consent to Columbia Legal Services representing and filing some sort of legal action against DOC for how I am being treated.

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 15th day of June 2020 at Connell Washington.



Andres Ferrer

COLUMBIA LEGAL SERVICES, INSTITUTIONS PROJECT

June 23, 2020 - 6:17 PM

Transmittal Information

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

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Motion 1 - Overlength Motion
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