

FILED
SUPREME COURT
STATE OF WASHINGTON
3/25/2020 10:06 AM
BY SUSAN L. CARLSON
CLERK

No. _____

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 LINDA GRAHAM

Nicholas Allen, WSBA #42990
Nicholas B. Straley, WSBA #25963
Janet S. Chung, WSBA #28535
Columbia Legal Services
101 Yesler Way, Suite 300
Seattle, WA 98104
Telephone: (206) 464-1122
Attorneys for Petitioners

I, Linda Graham, declare under penalty of perjury under the laws of the State of Washington that the following statements are true and correct to my best knowledge and belief:

1. I am 65 years old and am competent to testify as to the contents of this declaration.
2. My address is [REDACTED]
[REDACTED]
3. My husband's name is John Graham and he is currently locked up at the prison in Shelton.
4. He is 67 years old. His DOC number is 420857.
5. He entered prison on January 17, 2020. He has an early release date of September 17, 2020.
6. We've been married for 28 years. We own a home together in Puyallup where he would come when he is released.
7. He currently has no serious medical needs.
8. He is low risk and low security but been stuck in Shelton since January. He should be in minimum security, but they haven't moved him yet.
9. No one else lives with me and so, my husband and I could take care of each other if he was home here with me.

10. He'd be happy to do home monitoring to serve out the rest of his sentence.

11. I talked to his counselor yesterday to start his early release package.

12. I spoke with him today. He is now in a cell designed for two people. They now have put an extra person in his cell who has no bed. He is sleeping on the floor. There are now three men sharing a cell designed only for two.

13. DOC apparently has opened a quarantine wing and so needs to push more people into the existing cells.

14. They are beginning to overcrowd the cells because of the quarantine in other parts of the prison.

15. I just got my visitation approved this week by DOC to see him. I haven't been able to see him because DOC requires people to get approved before they can visit people.

16. It takes DOC weeks to approve people for visitation after someone comes into DOC.

17. So since they hadn't approved me yet I have not seen my husband since he entered prison in January.

18. But now the prisons are barring visitation so I can't see him anyway.

19. There is no video visitation at Shelton or any way for me to visit him any longer because there is no visitation.

20. Now there are so many people in the wing that its really hard to get phone time.

21. He said all of the guys are concerned about what is going on and trying to reach loved ones and there are long lines for the phone.

22. He said the younger guys always beat him to the phone.

23. I authorize Columbia Legal Services to file litigation against DOC to address the COVID health crisis in prisons.

DATED this 19th day of March 2020 in Puyallup, Washington.

I am unable to sign this document as it was prepared in Seattle, but I have had it read to me over the telephone and authorize Nick Straley to sign it on my behalf.

A handwritten signature in black ink, appearing to be 'LGS' with a checkmark-like flourish at the end.

Linda Graham, by Nicholas B. Straley, WSBA #25963

CERTIFICATION RE AUTHORIZATION TO SIGN
ON BEHALF OF DECLARANTS

I, Nicholas B. Straley, declare under penalty of perjury under the laws of the State of Washington:

1. I am counsel for the petitioners in this action.
2. Due to shortened time and limitations on access to the declarants due to the current public health emergency, distance, shortened time, and prison procedures, I was unable to obtain physical signatures from the declarants.
3. I personally spoke with following declarants over the telephone on the dates and times stated herein. I drafted each declarant's declaration while on the telephone with them. At the conclusion of the call, I read each declarant's declaration to them, and each declarant stated to me that they believed the contents to their declaration to be true and correct, and authorized me to sign the declaration on their behalf.

<u>Declarant</u>	<u>Date</u>
Linda Graham	March 19, 2020
Daniel Ralph Maples	March 19, 2020
Maurice Phillip-Meadows	March 18, 2020
Shanell Duncan	March 19, 2020

DATED this 22nd day of March, 2020 at Seattle, Washington.



Nicholas B. Straley, WSBA #25963

COLUMBIA LEGAL SERVICES, INSTITUTIONS PROJECT

March 25, 2020 - 10:06 AM

Transmittal Information

Filed with Court: Supreme Court
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- Jeff.Even@atg.wa.gov
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- nick.straley@columbialegal.org
- tim.lang@atg.wa.gov

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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