

FILED  
SUPREME COURT  
STATE OF WASHINGTON  
3/25/2020 8:00 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 THEODORE ROOSEVELT RHONE**

---

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, Theodore Roosevelt Rhone, do hereby certify and declare as follows:

1. I am an inmate at Stafford Creek Corrections Center in Aberdeen. My DOC # is 708234.

2. I was born on [REDACTED], 1958. I am 62 years old.

3. I am diabetic and insulin dependent and take oral medications for diabetes. I have high blood pressure, neuropathy, and some eye problems. I was once stabbed in the heart in the 1990s and require medical testing to make sure I am okay.


4. I am very worried about getting the COVID-19 virus, and am afraid that if I get the virus, there will not be sufficient medical resources in the DOC to care for me.

5. I consent to Columbia Legal Services filing a lawsuit on my behalf to address the issues raised by COVID-19 and the provision of proper medical care in the Washington Department of Corrections.

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

Dated this 18<sup>th</sup> day of March 2020, at Aberdeen, Washington.

I am unable to sign this document as it was prepared in Seattle, but I have had it read to me and I am authorizing Neil Fox to sign it on my behalf.

  
Theodore Roosevelt Rhone, by Neil Fox

CERTIFICATION RE AUTHORIZATION TO SIGN  
ON BEHALF OF DECLARANTS

I, Neil Fox, certifies and declares as follows:

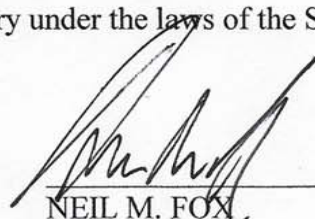
1. Due to shortened time and limitations on personal access to the declarants listed below, based on the current public health emergency, distance, shortened time, and prison procedures, I was unable to obtain physical signatures from the declarants.

2. I personally spoke with following declarants over the telephone on the dates stated herein. I drafted each declarant's declaration while on the telephone with them. After drafting the declarations, I read each declarant's declaration to them word for word including the wording in the unsworn declaration section. Each declarant stated to me that the declarations were accurate and true and correct, and authorized me to sign the declaration on their behalf.

<u>Declarant</u>	<u>Date</u>
Theodore Roosevelt Rhone	March 18, 2020
Joseph Siriani	March 18, 2020
Brian Stark	March 18, 2020
Hozie Holley	March 18, 2020

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

3/22/20 Seattle WA  
DATE AND PLACE

  
\_\_\_\_\_  
NEIL M. FOX  
WSBA NO. 15277

# COLUMBIA LEGAL SERVICES, INSTITUTIONS PROJECT

March 24, 2020 - 7:20 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.

### The following documents have been uploaded:

- 983178\_Other\_20200324191930SC593581\_2077.pdf  
This File Contains:  
Other - Declaration  
*The Original File Name was 20 0318 Rhone Decl - FINAL\_Redacted.pdf*

### A copy of the uploaded files will be sent to:

- Jeff.Even@atg.wa.gov
- janet.chung@columbialegal.org
- jeffe@atg.wa.gov
- nick.straley@columbialegal.org
- tim.lang@atg.wa.gov

### Comments:

Declaration in Support of Petition for Mandamus

---

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

**Note: The Filing Id is 20200324191930SC593581**