

FILED
SUPREME COURT
STATE OF WASHINGTON
4/9/2020 8:17 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.

DECLARATION OF JULIA BLADIN

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, Julia Bladin, declare under penalty of perjury under the laws of the State of Washington that the following statements are true and correct to the best of my knowledge:

1. I am an employee of Columbia Legal Services (CLS) where I work as a Legal Assistant.
2. As a Legal Assistant, I am responsible for managing CLS's attorney collect line, which allows people from institutions, including prisons to contact CLS to make confidential calls to CLS at no charge.
3. For the past several weeks, we have been hearing concerns from people who are in Department of Corrections facilities and their family members regarding fears about COVID-19. These concerns have been increasing, especially since DOC first confirmed cases among staff.
4. Since Monday, April 6, 2020 – the date that the first person in a Washington Department of Corrections prison tested positive for COVID-19 – CLS has received over one hundred calls from the collect line from people in prison across the State who are concerned about COVID-19 entering the prisons.
5. In the past 48 hours, I spoke with at least 15 people from the Monroe Correctional Complex Minimum Security Unit (“MCC-MSU”), who have raised their concerns about COVID-19 in that facility

given that a number of staff and people in prison have tested positive for COVID-19 in that prison.

6. Many of the people I have talked with at MCC-MSU have serious concerns about their safety and are really scared because they are older and/or have underlying health conditions, such as respiratory issues.

7. The people I spoke with have also shared with me that many staff are not consistently wearing masks in the units, even though staff have access to masks and other protective gear, while the people incarcerated in the prison generally do not have access to these materials. Another said that they heard that wearing of masks for staff is supposed to be mandatory, but that it seems optional because there is no consistency among staff. One person explained to me that people were given masks at work, but that correctional officers would confiscate them from people when they returned to the unit.

8. The people I talked with at MCC-MSU also feel at risk of catching COVID-19 because social distancing is impossible within their units, and many of the other people in their units are sick and have symptoms of COVID-19, such as coughing. One prisoner stated that people in B unit are “falling like flies.”

9. Callers also mentioned that sanitation and screening protocols remain insufficient. DOC had allowed yellow hazardous waste

bags to pile up in the hallway where people enter and exit for chow hall. They have been given hand soap and bleach, too; however, the bleach is heavily diluted so as not to be effective.

10. Screening protocols consist solely of taking a person's temperature and asking them about their symptoms.

11. Callers also mentioned that DOC has created a tense environment due to the quarantining of people and the lack of information that is being shared with people in the units. One caller noted that inmates in B-unit were "going off" due to being quarantined. Several callers noted that on April 7, 2020, people in B-unit barricaded themselves in their cells and that the correctional officers brought in McDonald's food to try to calm them down.

12. Adding to the tension is that that people are just taken off the unit without any explanation, creating confusion and uncertainty. Additionally, there was mention of staff taking the temperatures of people in the unit, and then telling those individuals what their temperature were in front of other individuals. These actions have the potential to create conflict in the unit. If other prisoners have access to this medical information, it could lead to stigma or violence against an individual whose temperature may be symptomatic of COVID-19.

13. I have also received numerous calls and voicemails from family and friends of people at MCC-MSU, who are very concerned about their loved one's safety in light of transmission of COVID-19 in the facility.

DATED this 8th day of April, 2020 at Seattle, Washington.



Julia Bladin
Columbia Legal Services

COLUMBIA LEGAL SERVICES, INSTITUTIONS PROJECT

April 09, 2020 - 8:17 AM

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_Affidavit_Declaration_20200409081658SC603124_2407.pdf
This File Contains:
Affidavit/Declaration - Other
The Original File Name was 20_0408 Bladin Declaration.pdf

A copy of the uploaded files will be sent to:

- DAdreBCunningham@gmail.com
- John.Samson@atg.wa.gov
- PCpatcecf@piercecountywa.gov
- alex.bergstrom@columbialegal.or
- andrea@smithalling.com
- changro@seattleu.edu
- correader@atg.wa.gov
- 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
- jmidgley@aclu-wa.org
- julia.bladin@columbialegal.org
- leeme@seattleu.edu
- mmc@smithalling.com
- nblock@co.skagit.wa.us
- nf@neilfoxlaw.com
- nick.straley@columbialegal.org
- pleadings@aclu-wa.org
- rachael@dr-wa.org
- sbuergel@paulweiss.com
- talner@aclu-wa.org
- tdavis@aclu-wa.org
- teresa.chen@piercecountywa.gov
- tim.lang@atg.wa.gov

Comments:

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 20200409081658SC603124