

OCT 08 2013

FILED
SKAGIT COUNTY CLERK
SKAGIT COUNTY, WA

Schwerin Campbell Barnard
Iglitzin & Lavitt LLP

2013 OCT -7 AM 10:24

HONORABLE JOHN M. MEYER

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SKAGIT

FAMILIAS UNIDAS POR LA JUSTICIA, an
unincorporated association, AND FELIMON
PINEDA, an individual,

Plaintiffs,

v.

SAKUMA BROTHERS FARMS, INC.,

Defendant.

No. 13-2-01641-1

**STIPULATION AND AGREED
FINAL INJUNCTIVE ORDER**

The parties, Plaintiffs Familias Unidas Por La Justicia and Felimon Pineda and Defendant Sakuma Brothers Farms, Inc., hereby stipulate, through their attorneys of record, and request that the Court issue as the Final Injunctive Order the proposed order below.

RESPECTFULLY SUBMITTED this 6th day of October, 2013.

Adam S. Belzberg
Adam S. Belzberg, WSBA No. 41022
GRAHAM & DUNN PC
Pier 70, 2801 Alaskan Way Ste. 300
Seattle, WA 98121-1128
(206) 340-9654 (phone)
(206) 340-9599 (fax)
Email: abelzberg@grahamdunn.com
Attorneys for Defendant Sakuma Brothers Farms, Inc.

Kathleen Phair Barnard
Kathleen Phair Barnard, WSBA No. 17896
Laura Ewan, WSBA No. 45201
SCHWERIN CAMPBELL BARNARD
IGLITZIN & LAVITT LLP
18 West Mercer Street, Suite 400
Seattle, WA 98119
(206) 285-2828 (phone)
(206) 378-4132 (fax)
Email: barnard@workerlaw.com
Attorneys for Familias Unidas por la Justicia

Stipulation and Agreed Final Injunctive Order - 1
Case No. 13-2-01641-1

COPY

LAW OFFICES OF
SCHWERIN CAMPBELL
BARNARD IGLITZIN & LAVITT LLP
18 WEST MERCER STREET SUITE 400
SEATTLE, WASHINGTON 98119-3971
(206) 285-2828

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Andrea L. Schmitt by KLB for author

Andrea L. Schmitt, WSBA No. 39759
Joachim Morrison, WSBA No. 23094
COLUMBIA LEGAL SERVICES
711 Capitol Way S #304
Olympia, WA 98501
(360) 943 6260 (phone)
Email: Andrea.Schmitt@ColumbiaLegal.org

Attorneys for Plaintiff Felimon Pineda

ORDER

The Court, having considered the stipulation of the parties, Plaintiffs Familias Unidas Por La Justicia and Felimon Pineda and Defendant Sakuma Brothers Farms, Inc.,

HEREBY ORDERS the following:

1. The show cause hearing scheduled for October 8, 2013 is stricken;
2. Defendant Sakuma is restrained and enjoined from:
 - a. Placing security personnel, for the duration of the 2013 harvest season during which any domestic workers are living in any of Defendant's labor camps, at or within one-half mile of the boundaries of the labor camps where Plaintiffs reside in such a manner as to allow surveillance of the yard surrounding the housing in those camps and the statutorily protected concerted activities of the Plaintiffs, except that this Order does not impact or restrict Defendant's right to maintain security at the company's processing plant;

1 b. Following Plaintiffs or the Workers, or community supporters of the
2 workers on the public highways or elsewhere.

3 3. Each party shall bear its own fees and costs in this matter.

4 4. This Final Order and Judgment resolves all the issues before the Court in this
5 action.

6
7 SIGNED this _____ day of OCT 07 2013, 2013.

JOHN M. MEYER

8 _____
9 JOHN M. MEYER
10 SKAGIT COUNTY SUPERIOR COURT JUDGE