

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 MAURICE PHILLIP-MEADOWS

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, Maurice Phillip-Meadows, declare under penalty of perjury under the laws of the United States of America that the following statements are true and correct to my best knowledge and belief:

1. I am 59 years old and I had triple bypass surgery on May 15, 2018.
2. My birthday is [REDACTED]/1960,
3. I am over the age of 18 and am competent to testify as to the contents of this declaration.

Background

4. I am currently in detention at the Twin Rivers Unit at Monroe Correctional Center.
5. My DOC number is #975603.
6. I have been at this facility since July 2007.
7. My ERD is December 2027. I've been in for 20 years.
8. I'm trying to get clemency right now.
9. I'm in a single cell in A unit, B wing at TRU.
10. I have a wet cell without a shower.
11. The showers are community showers.
12. 40 guys share six showers in the wing.
13. At least half of us are in the dayroom all of the time. It's mostly single cells on my wing.

14. All of us go to yard and to meals at the same time with other men from other units.

15. Everyone is out during the day.

16. We share ice, there's an ice chest and we scoop into it with a communal scoop . So people are sharing the scoop and it doesn't get washed that often.

17. They have not given us hand sanitizer for use in our cells. They have some in a few areas around the prison, but no hand sanitizer in our dayroom.

18. We're still going to yard. They cut down religious programs. There is no visiting right now.

19. There are four units at Twin Rivers Unit and they closed one wing down.

20. They opened a different unit and quarantined a whole wing.

21. People are in cell unit quarantine. People are now in isolation.

Medical History

22. I had triple bypass heart surgery in May 2018.

23. For a bunch of time before my surgery, they didn't want to send me out to get my heart checked by a cardiologist. They denied me. It took a long time to get anything done.

24. I had 5 or 6 heart attacks while in DOC custody before I received any out of prison or saw a cardiologist.
25. They sent me a paper saying that my chest pains were deemed not medically necessary to see a cardiologist.
26. My wife had to fight for me, because the medical team here were not going to give me any help. Finally, headquarters ordered them to send me out for an echo-cardiogram with a cardiologist.
27. I was coming out of anesthesia from the echo-cardiogram and the outside doctor in the hospital told me that my condition was so urgent that they were admitting me to the hospital that day.
28. That day they admitted immediately after getting the echo-cardiogram and I was in surgery within 5 days.
29. I had to rehab after my surgery by myself. They didn't do anything for my rehab after surgery.
30. They haven't sent me back out to see my cardiologist in over a year, even though I was supposed to see him in January.
31. The last time I saw him my ejection fraction test I was at 16%. Normal would be 100%.
32. I asked to go see him because I don't know what is going on. My chest is still numb from the surgery. They've failed to get me back to see him, even though I've asked.

33. I have hypertension. They have me on medication for hypertension.

34. I worry about my health condition while I am detained here. Due to my medical conditions I am aware that I am at a higher risk of contracting the coronavirus than most.

35. Based on the information I have been able to gather, I am aware that my existing medical conditions expose me to more severe symptoms of the corona virus than most.

36. I've completed around 40 different programs, including CD treatment, stress anger management, redemption mentorship, I have a long list.

37. They've told us to go to sick call if we start feeling sick.

38. Sick call is at 7:30 in the morning. You're called out with everyone else going to sick call and you walk down to the infirmary. You fill out a piece of paper and then wait to be seen with the other guys who are waiting for sick call. While waiting, you are in a small room with lots of guys, sometimes 10 or 15 other people.

My work in the Kitchen

39. I work in the kitchen and am worried about that too, because population comes through to get food and then they sit at tables all together to eat. We eat at the same tables.

40. We prepare 750 meals and there are two sides for eating, a south and north side line.

41. So around 375 men will come through each of the chow line two times a day, at lunch and at dinner.

42. They don't have any hand sanitizers for men when they come into the chow hall.

43. It's a blind feed and you grab a tray and go around the corner to sit down.

44. They don't sanitize the transfer area very often.

45. Six men share a single table while eating.

46. There are about 40 tables. The tables are within about 3 feet of each other.

47. Up to 50 guys work in the kitchen area at any one time. There are a lot of different stations where people are working.

48. DOC has told us that we can't use some pink cleaners. But no other training or protocol since the coronavirus outbreak for how to keep the kitchen area clean or how not to spread germs to other men who we are working with or feeding.

Who I Am

49. I'm trying to get clemency.

50. I've helped create a culinary arts mentorship program and been a leader for African-Americans, in side I was the president for Full Gospel Businessmens Fellowship International. I'm a worship leader and also a Christian representative. I mentor other men.

51. I have a job waiting for me if I am released. I'm married and could immediately move in with my wife in Edmonds.

52. I haven't had a major infraction since 2006.

53. Columbia Legal Services has permission to move forward with litigation against DOC on my behalf to try and help the situation here given this dangerous public health crisis.

DATED this 18th day of March 2020, in Monroe, Washington.

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



Maurice Phillip-Meadows, 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 24, 2020 - 7:15 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:

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

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