

**UNITED STATE DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

**RUSSEL H. DAWSON, PERSONAL
REPRESENTATIVE OF THE ESTATE OF
DAMARIS RODRIGUEZ; REYNALDO
GIL; JOSE MARTE; A.R.; I.R.; S.R.;
D.R.,**

Plaintiffs,

vs.

**SOUTH CORRECTIONAL ENTITY
("SCORE"), et al,**

Defendant

No. 2:19-cv-01987-RSM

**SCORE DEFENDANTS' ANSWER TO
PLAINTIFFS' FIRST AMENDED
COMPLAINT**

Defendants South Correctional Entity ("SCORE"), Penny Bartley, Jim Kelly, Todd Barker, Brittney Palmore, Brandon Heath, Pedro Santos, Mandi Jaramillo, William Woo, Brenda Scott, Ethan Glover, Christopher Foy, Jane Dore, Colminton Allen, Aaron Seipp and SCORE John Does 1-10 (hereinafter "SCORE Defendants") answer Plaintiffs' First Amended Complaint For Damages as follows:

I. INTRODUCTION

1. In answer to Paragraph 1, SCORE Defendants object that this paragraph is argumentative and vague. It is denied on that basis. SCORE Defendants also deny any and all factual allegations in this paragraph.

1 2. In answer to Paragraph 2, SCORE Defendants object that this paragraph is
2 argumentative and vague. It is denied on that basis. SCORE Defendants are without knowledge
3 or information sufficient to form a belief as to the truth of the factual allegations of said
4 paragraph and therefore deny the same.

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6 3. In answer to Paragraph 3, SCORE Defendants object that this paragraph is
7 argumentative and vague. It is denied on that basis. These defendants admit NaphCare
8 provided medical personnel to the SCORE Jail. The remaining allegations concern other
9 defendants, and thus require no response from SCORE Defendants. To the extent this
10 paragraph makes any other allegations against the SCORE Defendants, they are denied.

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12 4. In answer to Paragraph 4, SCORE Defendants object that this paragraph is
13 argumentative and vague. It is denied on that basis. To the extent this paragraph makes any
14 other allegations against the SCORE Defendants, they are denied.

15 5. In answer to Paragraph 5, SCORE Defendants object that this paragraph is
16 argumentative and vague. It is denied on that basis. To the extent this paragraph makes any
17 other allegations against the SCORE Defendants, they are denied.

18
19 6. In answer to Paragraph 6, SCORE Defendants object that this paragraph is
20 argumentative and vague. It is denied on that basis. To the extent this paragraph makes any
21 other allegations against the SCORE Defendants, they are denied.

22 7. In answer to Paragraph 7, SCORE Defendants object that this paragraph is
23 argumentative and vague. It is denied on that basis. To the extent this paragraph makes any
24 other allegations against the SCORE Defendants, they are denied.
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8. In answer to Paragraph 8, SCORE Defendants object that this paragraph is argumentative and vague. It is denied on that basis. To the extent this paragraph makes any other allegations against the SCORE Defendants, they are denied.

9. In answer to Paragraph 9, SCORE Defendants object that this paragraph is argumentative and vague. It is denied on that basis. To the extent this paragraph makes any other allegations against the SCORE Defendants, they are denied.

10. In answer to Paragraph 10, SCORE Defendants object that this paragraph is argumentative and vague. It is denied on that basis. To the extent this paragraph makes any other allegations against the SCORE Defendants, they are denied.

11. In answer to Paragraph 11, SCORE Defendants neither admit nor deny as this paragraph makes no factual allegations against these defendants.

II. JURISDICTION AND VENUE

12. In answer to Paragraph 12, SCORE Defendants neither admit nor deny as this paragraph makes no factual allegations against these defendants.

13. In answer to Paragraph 13, SCORE Defendants neither admit nor deny as this paragraph makes no factual allegations against these defendants.

14. In answer to Paragraph 14, SCORE Defendants neither admit nor deny as this paragraph makes no factual allegations against these defendants.

15. In answer to Paragraph 15, SCORE Defendants neither admit nor deny as this paragraph makes no factual allegations against these defendants.

III. PARTIES

16. In answer to Paragraph 16, SCORE Defendants are without knowledge or information sufficient to form a belief as to the truth of the factual allegations of said paragraph

1 and therefore deny the same. SCORE Defendants neither admit nor deny the remainder of this
2 paragraph as it makes no factual allegations against these defendants

3 17. In answer to Paragraph 17, SCORE Defendants are without knowledge or
4 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
5 and therefore deny the same.
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7 18. In answer to Paragraph 18, SCORE Defendants are without knowledge or
8 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
9 and therefore deny the same.
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11 19. In answer to Paragraph 19, SCORE Defendants are without knowledge or
12 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
13 and therefore deny the same.

14 20. In answer to Paragraph 20, SCORE Defendants are without knowledge or
15 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
16 and therefore deny the same.
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18 21. In answer to Paragraph 21, SCORE Defendants are without knowledge or
19 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
20 and therefore deny the same.

21 22. In answer to Paragraph 22, SCORE Defendants are without knowledge or
22 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
23 and therefore deny the same.
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25 23. In answer to Paragraph 23, SCORE Defendants admit the same.

26 24. In answer to Paragraph 24, SCORE Defendants admit the same.

25. In answer to Paragraph 25, SCORE Defendants deny the same.

1 26. In answer to Paragraph 26, SCORE Defendants object that this paragraph is a
2 conclusion of law, not an allegation of fact, and is denied on that basis.

3 27. In answer to Paragraph 27, SCORE Defendants object that this paragraph is a
4 conclusion of law, not an allegation of fact, and is denied on that basis.

5 28. In answer to Paragraph 28, SCORE Defendants are without knowledge or
6 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
7 and therefore deny the same.

8 29. In answer to Paragraph 29, SCORE Defendants admit Penny Bartley was formerly
9 executive director of SCORE Jail. The duties of the executive director are reflected in policies
10 and procedures established by SCORE and speak for themselves. This paragraph is denied on
11 that basis.

12 30. In answer to Paragraph 30, SCORE Defendants admit Jim Kelly was formerly the
13 deputy executive director of SCORE Jail. The duties of the executive director are reflected in
14 policies and procedures established by SCORE and speak for themselves. This paragraph is
15 denied on that basis.

16 31. In answer to Paragraph 31, SCORE Defendants are without knowledge or
17 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
18 and therefore deny the same.

19 32. In answer to Paragraph 32, SCORE Defendants are without knowledge or
20 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
21 and therefore deny the same.

22 33. In answer to Paragraph 33, SCORE Defendants admit the same, with the
23 exception of SCORE John Does 1-10. SCORE Defendants are without knowledge or information
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1 sufficient to form a belief as to the truth of the factual allegations regarding SCORE John Does
2 1-10 and therefore deny the same.

3 34. In answer to Paragraph 34, SCORE Defendants object that this paragraph is a
4 conclusion of law, not an allegation of fact, and is denied on that basis.

5 35. In answer to Paragraph 35, SCORE Defendants are without knowledge or
6 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
7 and therefore deny the same. SCORE Defendants also object that this paragraph is a conclusion
8 of law, not an allegation of fact, and is denied on that basis.

9 36. In answer to Paragraph 36, SCORE Defendants neither admit nor deny as this
10 paragraph makes no factual allegations against these defendants.

11 37. In answer to Paragraph 37, SCORE Defendants neither admit nor deny as this
12 paragraph makes no factual allegations against these defendants.

13 38. In answer to Paragraph 38, SCORE Defendants neither admit nor deny as this
14 paragraph makes no factual allegations against these defendants.

15 39. In answer to Paragraph 39, SCORE Defendants neither admit nor deny as this
16 paragraph makes no factual allegations against these defendants.

17 40. In answer to Paragraph 40, SCORE Defendants neither admit nor deny as this
18 paragraph makes no factual allegations against these defendants.

19 41. In answer to Paragraph 41, SCORE Defendants neither admit nor deny as this
20 paragraph makes no factual allegations against these defendants.

21 42. In answer to Paragraph 42, SCORE Defendants neither admit nor deny as this
22 paragraph makes no factual allegations against these defendants.

1 43. In answer to Paragraph 43, SCORE Defendants neither admit nor deny as this
2 paragraph makes no factual allegations against these defendants.

3 44. In answer to Paragraph 44, SCORE Defendants neither admit nor deny as this
4 paragraph makes no factual allegations against these defendants.

5 45. In answer to Paragraph 45, SCORE Defendants neither admit nor deny as this
6 paragraph makes no factual allegations against these defendants.

7 46. In answer to Paragraph 46, SCORE Defendants neither admit nor deny as this
8 paragraph makes no factual allegations against these defendants.

9 47. In answer to Paragraph 47, SCORE Defendants neither admit nor deny as this
10 paragraph makes no factual allegations against these defendants.

11 48. In answer to Paragraph 48, SCORE Defendants neither admit nor deny as this
12 paragraph makes no factual allegations against these defendants.

13 49. In answer to Paragraph 49, SCORE Defendants neither admit nor deny as this
14 paragraph makes no factual allegations against these defendants.

15 50. In answer to Paragraph 50, SCORE Defendants neither admit nor deny as this
16 paragraph makes no factual allegations against these defendants.

17 51. In answer to Paragraph 51, SCORE Defendants neither admit nor deny as this
18 paragraph makes no factual allegations against these defendants.

19 52. In answer to Paragraph 52, SCORE Defendants neither admit nor deny as this
20 paragraph makes no factual allegations against these defendants.

21 53. In answer to Paragraph 53, SCORE Defendants neither admit nor deny as this
22 paragraph makes no factual allegations against these defendants.

54. In answer to Paragraph 54, SCORE Defendants neither admit nor deny as this paragraph makes no factual allegations against these defendants.

55. In answer to Paragraph 55, SCORE Defendants neither admit nor deny as this paragraph makes no factual allegations against these defendants.

56. In answer to Paragraph 56, SCORE Defendants neither admit nor deny as this paragraph makes no factual allegations against these defendants.

57. In answer to Paragraph 57, SCORE Defendants neither admit nor deny as this paragraph makes no factual allegations against these defendants.

58. In answer to Paragraph 58, SCORE Defendants neither admit nor deny as this paragraph makes no factual allegations against these defendants.

59. In answer to Paragraph 59, SCORE Defendants neither admit nor deny as this paragraph makes no factual allegations against these defendants.

60. In answer to Paragraph 60, SCORE Defendants are without knowledge or information sufficient to form a belief as to the truth of the factual allegations of said paragraph and therefore deny the same.

61. In answer to Paragraph 61, SCORE Defendants are without knowledge or information sufficient to form a belief as to the truth of the factual allegations of said paragraph and therefore deny the same.

IV. FACTS

62. In answer to Paragraph 62, SCORE Defendants are without knowledge or information sufficient to form a belief as to the truth of the factual allegations of said paragraph and therefore deny the same.

1 63. In answer to Paragraph 63, SCORE Defendants are without knowledge or
2 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
3 and therefore deny the same.

4 64. In answer to Paragraph 64, SCORE Defendants are without knowledge or
5 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
6 and therefore deny the same.

7 65. In answer to Paragraph 65, SCORE Defendants are without knowledge or
8 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
9 and therefore deny the same.

10 66. In answer to Paragraph 66, SCORE Defendants are without knowledge or
11 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
12 and therefore deny the same.

13 67. In answer to Paragraph 67, SCORE Defendants are without knowledge or
14 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
15 and therefore deny the same.

16 68. In answer to Paragraph 68, SCORE Defendants are without knowledge or
17 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
18 and therefore deny the same.

19 69. In answer to Paragraph 69, SCORE Defendants are without knowledge or
20 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
21 and therefore deny the same.

22 70. In answer to Paragraph 70, SCORE Defendants are without knowledge or
23 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
24 and therefore deny the same.

1 70. In answer to Paragraph 70, SCORE Defendants are without knowledge or
2 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
3 and therefore deny the same.

4 71. In answer to Paragraph 71, SCORE Defendants are without knowledge or
5 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
6 and therefore deny the same.

7 72. In answer to Paragraph 72, SCORE Defendants are without knowledge or
8 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
9 and therefore deny the same.

10 73. In answer to Paragraph 73, SCORE Defendants are without knowledge or
11 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
12 and therefore deny the same.

13 74. In answer to Paragraph 74, SCORE Defendants are without knowledge or
14 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
15 and therefore deny the same.

16 75. In answer to Paragraph 75, SCORE Defendants are without knowledge or
17 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
18 and therefore deny the same.

19 76. In answer to Paragraph 76, SCORE Defendants are without knowledge or
20 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
21 and therefore deny the same.

1 77. In answer to Paragraph 77, SCORE Defendants are without knowledge or
2 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
3 and therefore deny the same.

4 78. In answer to Paragraph 78, SCORE Defendants are without knowledge or
5 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
6 and therefore deny the same.

7 79. In answer to Paragraph 79, SCORE Defendants are without knowledge or
8 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
9 and therefore deny the same.

10 80. In answer to Paragraph 80, SCORE Defendants admit the identified SCORE staff
11 encountered Ms. Rodriguez at the Sally Port when she arrived. These Defendants object that
12 the remainder this paragraph is argumentative and vague and is denied on that basis.

13 81. In answer to Paragraph 81, SCORE Defendants admit that Ms. Rodriguez was
14 brought into the SCORE Jail and placed in Cell B-02. These Defendants object that the
15 remainder this paragraph is argumentative and vague and is denied on that basis.

16 82. In answer to Paragraph 82, SCORE Defendants admit that Ms. Rodriguez
17 remained in Cell B-02. These Defendants object that the remainder this paragraph is
18 argumentative and vague and is denied on that basis.

19 83. In answer to Paragraph 83, SCORE Defendants admit that Ms. Rodriguez was
20 moved from Cell B-02 into Cell B-05 at approximately 3:17 p.m.. These Defendants object that
21 the remainder this paragraph is argumentative and vague and is denied on that basis.

22 84. In answer to Paragraph 84, SCORE Defendants object that this paragraph is
23 argumentative and vague and is denied on that basis.
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1 85. In answer to Paragraph 85, SCORE Defendants object that this paragraph is
2 argumentative and vague and is denied on that basis.

3 86. In answer to Paragraph 86, SCORE Defendants object that this paragraph is
4 argumentative and vague and is denied on that basis.

5 87. In answer to Paragraph 87, SCORE Defendants admit that Ms. Rodriguez was
6 moved from Cell B-02 into Cell B-05 at approximately 3:17 p.m.. These Defendants object that
7 the remainder this paragraph is argumentative and vague and is denied on that basis.

8 88. In answer to Paragraph 88, SCORE Defendants object that this paragraph is
9 argumentative and vague and is denied on that basis.

10 89. In answer to Paragraph 89, SCORE Defendants are without knowledge or
11 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
12 and therefore deny the same.

13 90. In answer to Paragraph 90, SCORE Defendants admit the first sentence but are
14 without knowledge or information sufficient to form a belief as to the truth of the remaining
15 factual allegations of said paragraph and therefore deny the same.

16 91. In answer to Paragraph 91, SCORE Defendants neither admit nor deny as this
17 paragraph makes no factual allegations against these defendants.

18 92. In answer to Paragraph 92, SCORE Defendants are without knowledge or
19 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
20 and therefore deny the same.

21 93. In answer to Paragraph 93, SCORE Defendants are without knowledge or
22 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
23 and therefore deny the same.

1 94. In answer to Paragraph 94, SCORE Defendants are without knowledge or
2 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
3 and therefore deny the same.

4 95. In answer to Paragraph 95, SCORE Defendants neither admit nor deny as this
5 paragraph makes no factual allegations against these defendants.
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7 96. In answer to Paragraph 96, SCORE Defendants neither admit nor deny as this
8 paragraph makes no factual allegations against these defendants.

9 97. In answer to Paragraph 97, SCORE Defendants admit the last sentence of this
10 paragraph. These Defendants object that the remainder this paragraph is argumentative and
11 vague and is denied on that basis.
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13 98. In answer to Paragraph 98, SCORE Defendants are without knowledge or
14 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
15 and therefore deny the same.

16 99. In answer to Paragraph 99, SCORE Defendants are without knowledge or
17 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
18 and therefore deny the same.
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20 100. In answer to Paragraph 100, SCORE Defendants neither admit nor deny as this
21 paragraph makes no factual allegations against these defendants.
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23 101. In answer to Paragraph 101, SCORE Defendants admit Ms. Rodriguez was not
24 moved to another cell at 4:36 p.m. on 12/31/2017. These Defendants object that the remainder
25 this paragraph is argumentative and vague and is denied on that basis.
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1 102. In answer to Paragraph 102, SCORE Defendants deny the first sentence. These
2 Defendants object that the remainder this paragraph is argumentative and vague and is denied
3 on that basis.

4 103. In answer to Paragraph 103, SCORE Defendants are without knowledge or
5 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
6 and therefore deny the same.

7 104. In answer to Paragraph 104, SCORE Defendants neither admit nor deny as this
8 paragraph makes no factual allegations against these defendants.

9 105. In answer to Paragraph 105, SCORE Defendants are without knowledge or
10 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
11 and therefore deny the same.

12 106. In answer to Paragraph 106, SCORE Defendants object that the last sentence of
13 this paragraph is argumentative and vague and is denied on that basis. These Defendants are
14 without knowledge or information sufficient to form a belief as to the truth of the remaining
15 factual allegations of said paragraph and therefore deny the same.

16 107. In answer to Paragraph 107, SCORE Defendants object that this paragraph is
17 argumentative and vague and is denied on that basis.

18 108. In answer to Paragraph 108, SCORE Defendants are without knowledge or
19 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
20 and therefore deny the same.

21 109. In answer to Paragraph 109, SCORE Defendants admit Ms. Rodriguez was moved
22 to Cell M-17 at approximately 9:19 p.m. on 12/31/2017. Defendants object that the remainder
23 of this paragraph is argumentative and vague and is denied on that basis.

1 110. In answer to Paragraph 110, SCORE Defendants neither admit nor deny as this
2 paragraph makes no factual allegations against these defendants.

3 111. In answer to Paragraph 111, SCORE Defendants admit Ms. Rodriguez was moved
4 to Cell M-17 at approximately 9:19 p.m. on 12/31/2017. Defendants object that the remainder
5 of this paragraph is argumentative and vague and is denied on that basis.

6 112. In answer to Paragraph 112, SCORE Defendants neither admit nor deny as this
7 paragraph makes no factual allegations against these defendants.

8 113. In answer to Paragraph 113, SCORE Defendants deny the same.

9 114. In answer to Paragraph 114, SCORE Defendants deny the same.

10 115. In answer to Paragraph 115, SCORE Defendants deny the same.

11 116. In answer to Paragraph 116, SCORE Defendants are without knowledge or
12 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
13 and therefore deny the same.

14 117. In answer to Paragraph 117, SCORE Defendants are without knowledge or
15 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
16 and therefore deny the same.

17 118. In answer to Paragraph 118, SCORE Defendants are without knowledge or
18 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
19 and therefore deny the same.

20 119. In answer to Paragraph 119, SCORE Defendants are without knowledge or
21 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
22 and therefore deny the same.

1 120. In answer to Paragraph 120, SCORE Defendants neither admit nor deny as this
2 paragraph makes no factual allegations against these defendants.

3 121. In answer to Paragraph 121, SCORE Defendants are without knowledge or
4 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
5 and therefore deny the same.

6 122. In answer to Paragraph 122, SCORE Defendants are without knowledge or
7 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
8 and therefore deny the same.

9 123. In answer to Paragraph 123, SCORE Defendants neither admit nor deny as this
10 paragraph makes no factual allegations against these defendants.

11 124. In answer to Paragraph 124, SCORE Defendants neither admit nor deny as this
12 paragraph makes no factual allegations against these defendants.

13 125. In answer to Paragraph 125, SCORE Defendants are without knowledge or
14 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
15 and therefore deny the same.

16 126. In answer to Paragraph 126, SCORE Defendants are without knowledge or
17 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
18 and therefore deny the same.

19 127. In answer to Paragraph 127, SCORE Defendants are without knowledge or
20 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
21 and therefore deny the same.

22 128. In answer to Paragraph 128, SCORE Defendants neither admit nor deny as this
23 paragraph makes no factual allegations against these defendants.
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1 129. In answer to Paragraph 129, SCORE Defendants neither admit nor deny as this
2 paragraph makes no factual allegations against these defendants.

3 130. In answer to Paragraph 130, SCORE Defendants are without knowledge or
4 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
5 and therefore deny the same.

6 131. In answer to Paragraph 131, SCORE Defendants are without knowledge or
7 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
8 and therefore deny the same.

9 132. In answer to Paragraph 132, SCORE Defendants are without knowledge or
10 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
11 and therefore deny the same.

12 133. In answer to Paragraph 133, SCORE Defendants are without knowledge or
13 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
14 and therefore deny the same.

15 134. In answer to Paragraph 134, SCORE Defendants are without knowledge or
16 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
17 and therefore deny the same.

18 135. In answer to Paragraph 135, SCORE Defendants deny the last sentence of this
19 paragraph and are without knowledge or information sufficient to form a belief as to the truth
20 of the remaining factual allegations of said paragraph and therefore deny the same.

21 136. In answer to Paragraph 136, SCORE Defendants deny the last sentence of this
22 paragraph and are without knowledge or information sufficient to form a belief as to the truth
23 of the remaining factual allegations of said paragraph and therefore deny the same.
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1 137. In answer to Paragraph 137, SCORE Defendants admit Ms. Rodriguez was moved
2 from Cell M-16 to Cell M-17 at approximately 1:04 p.m. on 1/2/2018. These Defendants deny
3 the remainder of this paragraph.
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5 138. In answer to Paragraph 138, SCORE Defendants are without knowledge or
6 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
7 and therefore deny the same.

8 139. In answer to Paragraph 139, SCORE Defendants are without knowledge or
9 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
10 and therefore deny the same.
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12 140. In answer to Paragraph 140, SCORE Defendants are without knowledge or
13 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
14 and therefore deny the same.

15 141. In answer to Paragraph 141, SCORE Defendants are without knowledge or
16 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
17 and therefore deny the same.
18

19 142. In answer to Paragraph 142, SCORE Defendants deny the last sentence of this
20 paragraph and are without knowledge or information sufficient to form a belief as to the truth
21 of the remaining factual allegations of said paragraph and therefore deny the same.

22 143. In answer to Paragraph 143, SCORE Defendants are without knowledge or
23 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
24 and therefore deny the same.
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1 144. In answer to Paragraph 144, SCORE Defendants are without knowledge or
2 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
3 and therefore deny the same.

4 145. In answer to Paragraph 145, SCORE Defendants are without knowledge or
5 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
6 and therefore deny the same.

7 146. In answer to Paragraph 146, SCORE Defendants are without knowledge or
8 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
9 and therefore deny the same.

10 147. In answer to Paragraph 147, SCORE Defendants are without knowledge or
11 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
12 and therefore deny the same.

13 148. In answer to Paragraph 148, SCORE Defendants are without knowledge or
14 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
15 and therefore deny the same.

16 149. In answer to Paragraph 149, SCORE Defendants neither admit nor deny as this
17 paragraph makes no factual allegations against these defendants.

18 150. In answer to Paragraph 150, SCORE Defendants neither admit nor deny as this
19 paragraph makes no factual allegations against these defendants.

20 151. In answer to Paragraph 151, SCORE Defendants admit Ms. Rodriguez was moved
21 to Cell M-14 at approximately 2:49 p.m. on 1/03/2018. Defendants are without knowledge or
22 information sufficient to form a belief as to the truth of the remaining factual allegations of said
23 paragraph and therefore deny the same.

1 152. In answer to Paragraph 152, SCORE Defendants neither admit nor deny as this
2 paragraph makes no factual allegations against these defendants.

3 153. In answer to Paragraph 153, SCORE Defendants deny the same.

4 154. In answer to Paragraph 154, SCORE Defendants are without knowledge or
5 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
6 and therefore deny the same.

7 155. In answer to Paragraph 155, SCORE Defendants are without knowledge or
8 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
9 and therefore deny the same.

10 156. In answer to Paragraph 156, SCORE Defendants neither admit nor deny as this
11 paragraph makes no factual allegations against these defendants.

12 157. In answer to Paragraph 157, SCORE Defendants neither admit nor deny as this
13 paragraph makes no factual allegations against these defendants.

14 158. In answer to Paragraph 158, SCORE Defendants neither admit nor deny as this
15 paragraph makes no factual allegations against these defendants.

16 159. In answer to Paragraph 159, SCORE Defendants object that this paragraph is
17 argumentative and is denied on that basis. These Defendants deny the factual allegations made
18 against them in this paragraph.

19 160. In answer to Paragraph 160, SCORE Defendants neither admit nor deny as this
20 paragraph makes no factual allegations against these defendants.

21 161. In answer to Paragraph 161, SCORE Defendants are without knowledge or
22 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
23 and therefore deny the same.

1 162. In answer to Paragraph 162, SCORE Defendants are without knowledge or
2 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
3 and therefore deny the same.

4 163. In answer to Paragraph 163, SCORE Defendants deny the same.

5 164. In answer to Paragraph 164, SCORE Defendants deny the same.

6 165. In answer to Paragraph 165, SCORE Defendants are without knowledge or
7 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
8 and therefore deny the same.

9 166. In answer to Paragraph 166, SCORE Defendants are without knowledge or
10 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
11 and therefore deny the same.

12 167. In answer to Paragraph 167, SCORE Defendants are without knowledge or
13 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
14 and therefore deny the same.

15 168. In answer to Paragraph 168, SCORE Defendants object that this paragraph is
16 vague and argumentative and is denied on that basis.

17 169. In answer to Paragraph 169, SCORE Defendants object that this paragraph is
18 vague, argumentative and speculative and is denied on that basis.

19 170. In answer to Paragraph 170, SCORE Defendants denies the last paragraph.
20 Defendants are without knowledge or information sufficient to form a belief as to the truth of
21 the remaining factual allegations of said paragraph and therefore deny the same.
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1 171. In answer to Paragraph 171, SCORE Defendants are without knowledge or
2 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
3 and therefore deny the same.

4 172. In answer to Paragraph 172, SCORE Defendants neither admit nor deny as this
5 paragraph makes no factual allegations against these defendants.

6 173. In answer to Paragraph 173, SCORE Defendants neither admit nor deny as this
7 paragraph makes no factual allegations against these defendants.

8 174. In answer to Paragraph 174, SCORE Defendants neither admit nor deny as this
9 paragraph makes no factual allegations against these defendants.

10 175. In answer to Paragraph 175, SCORE Defendants neither admit nor deny as this
11 paragraph makes no factual allegations against these defendants.

12 176. In answer to Paragraph 176, SCORE Defendants neither admit nor deny as this
13 paragraph makes no factual allegations against these defendants.

14 177. In answer to Paragraph 177, SCORE Defendants neither admit nor deny as this
15 paragraph makes no factual allegations against these defendants.

16 178. In answer to Paragraph 178, SCORE Defendants neither admit nor deny as this
17 paragraph makes no factual allegations against these defendants.

18 179. In answer to Paragraph 179, SCORE Defendants neither admit nor deny as this
19 paragraph makes no factual allegations against these defendants.

20 180. In answer to Paragraph 180, SCORE Defendants neither admit nor deny as this
21 paragraph makes no factual allegations against these defendants.

22 181. In answer to Paragraph 181, SCORE Defendants neither admit nor deny as this
23 paragraph makes no factual allegations against these defendants.

1 182. In answer to Paragraph 182, SCORE Defendants neither admit nor deny as this
2 paragraph makes no factual allegations against these defendants.

3 183. In answer to Paragraph 183, SCORE Defendants neither admit nor deny as this
4 paragraph makes no factual allegations against these defendants.

5 184. In answer to Paragraph 184, SCORE Defendants neither admit nor deny as this
6 paragraph makes no factual allegations against these defendants.

7 185. In answer to Paragraph 185, SCORE Defendants neither admit nor deny as this
8 paragraph makes no factual allegations against these defendants.

9 186. In answer to Paragraph 186, SCORE Defendants neither admit nor deny as this
10 paragraph makes no factual allegations against these defendants.

11 187. In answer to Paragraph 187, SCORE Defendants neither admit nor deny as this
12 paragraph makes no factual allegations against these defendants.

13 188. In answer to Paragraph 188, SCORE Defendants neither admit nor deny as this
14 paragraph makes no factual allegations against these defendants.

15 189. In answer to Paragraph 189, SCORE Defendants object that this paragraph is
16 argumentative and vague and is denied on that basis.

17 190. In answer to Paragraph 190, SCORE Defendants object that this paragraph is
18 argumentative and vague and is denied on that basis.

19 191. In answer to Paragraph 191, SCORE Defendants object that this paragraph is
20 argumentative and vague and is denied on that basis.

21 192. In answer to Paragraph 192, SCORE Defendants object that this paragraph is
22 argumentative and vague and is denied on that basis.

1 193. In answer to Paragraph 193, SCORE Defendants object that this paragraph is
2 argumentative and vague and is denied on that basis.

3 194. In answer to Paragraph 194, SCORE Defendants object that this paragraph is
4 argumentative and vague and is denied on that basis.

5 195. In answer to Paragraph 195, SCORE Defendants deny the same. To the extent this
6 paragraph makes allegations against other defendants, these defendants neither admit nor deny
7 those allegations.

8 196. In answer to Paragraph 196, SCORE Defendants deny the same. To the extent this
9 paragraph makes allegations against other defendants, these defendants neither admit nor deny
10 those allegations.

11 197. In answer to Paragraph 197, SCORE Defendants deny the same. To the extent this
12 paragraph makes allegations against other defendants, these defendants neither admit nor deny
13 those allegations.

14 198. In answer to Paragraph 198, SCORE Defendants deny the same. To the extent this
15 paragraph makes allegations against other defendants, these defendants neither admit nor deny
16 those allegations.

17 199. In answer to Paragraph 199, SCORE Defendants deny the same. To the extent this
18 paragraph makes allegations against other defendants, these defendants neither admit nor deny
19 those allegations.

20 200. In answer to Paragraph 200, SCORE Defendants deny the same. To the extent
21 this paragraph makes allegations against other defendants, these defendants neither admit nor
22 deny those allegations.

1 201. In answer to Paragraph 201, SCORE Defendants deny the same. To the extent this
2 paragraph makes allegations against other defendants, these defendants neither admit nor deny
3 those allegations.

4 202. In answer to Paragraph 202, SCORE Defendants deny the same. To the extent
5 this paragraph makes allegations against other defendants, these defendants neither admit nor
6 deny those allegations.

7 203. In answer to Paragraph 203, SCORE Defendants deny the same. To the extent this
8 paragraph makes allegations against other defendants, these defendants neither admit nor deny
9 those allegations.

10 204. In answer to Paragraph 204, SCORE Defendants deny the same. To the extent this
11 paragraph makes allegations against other defendants, these defendants neither admit nor deny
12 those allegations.

13 205. In answer to Paragraph 205, SCORE Defendants deny the same. To the extent this
14 paragraph makes allegations against other defendants, these defendants neither admit nor deny
15 those allegations.

16 206. In answer to Paragraph 206, SCORE Defendants deny the same. To the extent this
17 paragraph makes allegations against other defendants, these defendants neither admit nor deny
18 those allegations.

19 207. In answer to Paragraph 207, SCORE Defendants deny the same. To the extent this
20 paragraph makes allegations against other defendants, these defendants neither admit nor deny
21 those allegations.

22 208. In answer to Paragraph 208, SCORE Defendants deny the same. To the extent this
23 paragraph makes allegations against other defendants, these defendants neither admit nor deny
24 those allegations.

25 209. In answer to Paragraph 209, SCORE Defendants deny the same. To the extent this
26 paragraph makes allegations against other defendants, these defendants neither admit nor deny
those allegations.

1 208. In answer to Paragraph 208, SCORE Defendants object that this paragraph is
2 vague and argumentative and is denied on that basis. To the extent this paragraph makes
3 allegations against other defendants, these defendants neither admit nor deny those allegations.

4 209. In answer to Paragraph 209, SCORE Defendants deny the same. To the extent this
5 paragraph makes allegations against other defendants, these defendants neither admit nor deny
6 those allegations.

7 210. In answer to Paragraph 210, SCORE Defendants are without knowledge or
8 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
9 and therefore deny the same.

10 211. In answer to Paragraph 211, SCORE Defendants are without knowledge or
11 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
12 and therefore deny the same.

13 212. In answer to Paragraph 212, SCORE Defendants are without knowledge or
14 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
15 and therefore deny the same.

16 213. In answer to Paragraph 213, SCORE Defendants are without knowledge or
17 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
18 and therefore deny the same.

19 214. In answer to Paragraph 214, SCORE Defendants are without knowledge or
20 information sufficient to form a belief as to the truth of the factual allegations of said paragraph
21 and therefore deny the same.

217. In answer to Paragraph 217, SCORE Defendants deny the same.

218. In answer to Paragraph 218, SCORE Defendants are without knowledge or information sufficient to form a belief as to the truth of the factual allegations of said paragraph and therefore deny the same.

219. In answer to Paragraph 219, SCORE Defendants deny the same.

220. In answer to Paragraph 220, SCORE Defendants deny the same.

221. In answer to Paragraph 221, SCORE Defendants object that this paragraph is a conclusion of law, not an allegation of fact, and is denied on that basis.

222. In answer to Paragraph 202, SCORE Defendants object that this paragraph is argumentative, vague and a conclusion of law, not an allegation of fact, and is denied on that basis. To the extent this paragraph makes allegations against other defendants, these defendants neither admit nor deny those allegations.

223. In answer to Paragraph 203, SCORE Defendants object that this paragraph is argumentative, vague and a conclusion of law, not an allegation of fact, and is denied on that

1 basis. To the extent this paragraph makes allegations against other defendants, these
2 defendants neither admit nor deny those allegations.

3 224. In answer to Paragraph 204, SCORE Defendants object that this paragraph is
4 argumentative, vague and a conclusion of law, not an allegation of fact, and is denied on that
5 basis.
6

7 225. In answer to Paragraph 205, SCORE Defendants object that this paragraph is
8 argumentative, vague and a conclusion of law, not an allegation of fact, and is denied on that
9 basis.
10

11 226. In answer to Paragraph 206, SCORE Defendants object that this paragraph is
12 argumentative, vague and a conclusion of law, not an allegation of fact, and is denied on that
13 basis.

14 227. In answer to Paragraph 207, SCORE Defendants object that this paragraph is
15 argumentative, vague and a conclusion of law, not an allegation of fact, and is denied on that
16 basis.
17

18 228. In answer to Paragraph 208, SCORE Defendants admit Ms. Rodriguez was in
19 custody at SCORE Jail. These Defendants object that the remainder of this paragraph is
20 argumentative, vague and a conclusion of law, not an allegation of fact, and is denied on that
21 basis. To the extent this paragraph makes allegations against other defendants, these
22 defendants neither admit nor deny those allegations.

23 229. In answer to Paragraph 209, SCORE Defendants deny the same. To the extent this
24 paragraph makes allegations against other defendants, these defendants neither admit nor deny
25 those allegations.
26

1 230. In answer to Paragraph 210, SCORE Defendants deny the same. To the extent
2 this paragraph makes allegations against other defendants, these defendants neither admit nor
3 deny those allegations.

4 231. In answer to Paragraph 231, SCORE Defendants deny the same. To the extent this
5 paragraph makes allegations against other defendants, these defendants neither admit nor deny
6 those allegations.

7 232. In answer to Paragraph 232, SCORE Defendants deny the same. To the extent
8 this paragraph makes allegations against other defendants, these defendants neither admit nor
9 deny those allegations.

10 233. In answer to Paragraph 233, SCORE Defendants deny the same. To the extent this
11 paragraph makes allegations against other defendants, these defendants neither admit nor deny
12 those allegations.

13 234. In answer to Paragraph 234, SCORE Defendants deny the same.

14 235. In answer to Paragraph 235, SCORE Defendants deny the same. To the extent this
15 paragraph makes allegations against other defendants, these defendants neither admit nor deny
16 those allegations.

17 236. In answer to Paragraph 236, SCORE Defendants object that this paragraph is a
18 conclusion of law and is denied on that basis.

19 237. In answer to Paragraph 237, SCORE Defendants deny the same.

20 238. In answer to Paragraph 238, SCORE Defendants deny the same.

21 239. In answer to Paragraph 239, SCORE Defendants object that this paragraph is a
22 conclusion of law and is denied on that basis.

23 240. In answer to Paragraph 240, SCORE Defendants deny the same.

1 241. In answer to Paragraph 241, SCORE Defendants deny the same.

2 242. In answer to Paragraph 242, SCORE Defendants object that this paragraph is a
3 conclusion of law and is denied on that basis.

4 243. In answer to Paragraph 243, SCORE Defendants neither admit nor deny as this
5 paragraph makes no factual allegations against these defendants.

6 244. In answer to Paragraph 244, SCORE Defendants neither admit nor deny as this
7 paragraph makes no factual allegations against these defendants.

8 245. In answer to Paragraph 245, SCORE Defendants object that this paragraph is a
9 conclusion of law and is denied on that basis.

10 246. In answer to Paragraph 246, SCORE Defendants neither admit nor deny as this
11 paragraph makes no factual allegations against these defendants.

12 247. In answer to Paragraph 247, SCORE Defendants neither admit nor deny as this
13 paragraph makes no factual allegations against these defendants.

14 248. In answer to Paragraph 248, SCORE Defendants object that this paragraph is a
15 conclusion of law and is denied on that basis. To the extent facts are alleged in this paragraph,
16 they are denied.

17 249. In answer to Paragraph 249, SCORE Defendants object that this paragraph is a
18 conclusion of law and is denied on that basis.

19 250. In answer to Paragraph 250, SCORE Defendants deny the same.

20 251. In answer to Paragraph 251, SCORE Defendants deny the same.

21 252. In answer to Paragraph 252, SCORE Defendants deny the same.

22 253. In answer to Paragraph 253, SCORE Defendants deny the same.

1 254. In answer to Paragraph 254, SCORE Defendants object that this paragraph is a
2 conclusion of law and is denied on that basis.

3 255. In answer to Paragraph 255, SCORE Defendants object that this paragraph is a
4 conclusion of law and is denied on that basis.

5 256. In answer to Paragraph 256, SCORE Defendants object that this paragraph is a
6 conclusion of law and is denied on that basis.

7 257. In answer to Paragraph 257, SCORE Defendants deny the same. To the extent
8 this paragraph makes allegations against other defendants, these defendants neither admit nor
9 deny those allegations.

10 258. In answer to Paragraph 258, SCORE Defendants object that this paragraph is a
11 conclusion of law and is denied on that basis.

12 259. In answer to Paragraph 259, SCORE Defendants object that this paragraph is
13 argumentative and it is denied on that basis. To the extent facts are alleged, they are denied.

14 260. In answer to Paragraph 260, SCORE Defendants object that this paragraph is a
15 conclusion of law and is denied on that basis.

16 261. In answer to Paragraph 261, SCORE Defendants deny the same.

17 262. In answer to Paragraph 262, SCORE Defendants object that this paragraph is a
18 conclusion of law and is denied on that basis.

19 263. In answer to Paragraph 263, SCORE Defendants deny the same.

20 264. In answer to Paragraph 264, SCORE Defendants deny the same.

21 265. In answer to Paragraph 265, SCORE Defendants neither admit nor deny as this
22 paragraph makes no factual allegations against these defendants.
23
24
25
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1 266. In answer to Paragraph 266, SCORE Defendants neither admit nor deny as this
2 paragraph makes no factual allegations against these defendants.

3 267. In answer to Paragraph 267, SCORE Defendants neither admit nor deny as this
4 paragraph makes no factual allegations against these defendants.

5 268. In answer to Paragraph 268, SCORE Defendants neither admit nor deny as this
6 paragraph makes no factual allegations against these defendants.

7 269. In answer to Paragraph 269, SCORE Defendants neither admit nor deny as this
8 paragraph makes no factual allegations against these defendants.

9 270. In answer to Paragraph 270, SCORE Defendants object that this paragraph is a
10 conclusion of law and is denied on that basis.

11 271. In answer to Paragraph 271, SCORE Defendants neither admit nor deny as this
12 paragraph makes no factual allegations against these defendants.

13 272. In answer to Paragraph 272, SCORE Defendants neither admit nor deny as this
14 paragraph makes no factual allegations against these defendants.

15 273. In answer to Paragraph 273, SCORE Defendants object that this paragraph is a
16 conclusion of law and is denied on that basis.

17 274. In answer to Paragraph 274, SCORE Defendants neither admit nor deny as this
18 paragraph makes no factual allegations against these defendants.

19 275. In answer to Paragraph 275, SCORE Defendants neither admit nor deny as this
20 paragraph makes no factual allegations against these defendants.

21 276. In answer to Paragraph 276, SCORE Defendants object that this paragraph is a
22 conclusion of law and is denied on that basis.

1 277. In answer to Paragraph 277, SCORE Defendants object that the first sentence of
2 this paragraph is a conclusion of law and is denied on that basis. These defendants neither
3 admit nor deny the remainder of this paragraph as it makes no factual allegations against these
4 defendants.

5
6 278. In answer to Paragraph 278, SCORE Defendants neither admit nor deny as this
7 paragraph makes no factual allegations against these defendants.

8 279. In answer to Paragraph 279, SCORE Defendants neither admit nor deny as this
9 paragraph makes no factual allegations against these defendants.

10 280. In answer to Paragraph 280, SCORE Defendants neither admit nor deny as this
11 paragraph makes no factual allegations against these defendants.

12 281. In answer to Paragraph 281, SCORE Defendants neither admit nor deny as this
13 paragraph makes no factual allegations against these defendants.

14 282. In answer to Paragraph 282, SCORE Defendants neither admit nor deny as this
15 paragraph makes no factual allegations against these defendants.

16 283. In answer to Paragraph 283, SCORE Defendants object that the first sentence of
17 this paragraph is a conclusion of law and is denied on that basis.

18 284. In answer to Paragraph 284, SCORE Defendants neither admit nor deny as this
19 paragraph makes no factual allegations against these defendants.

20
21
22 **VI. JOINT LIABILITY**

23 285. In answer to Paragraph 285, SCORE Defendants deny the same.

24 **VII. DAMAGES**

25 286. In answer to Paragraph 286, SCORE Defendants deny the same.

26 287. In answer to Paragraph 287, SCORE Defendants deny the same.

288. In answer to Paragraph 288, SCORE Defendants deny the same.

289. In answer to Paragraph 289, SCORE Defendants deny the same.

VIII. JURY DEMAND

290. In answer to Paragraph 290, SCORE Defendants neither admit nor deny as this paragraph makes no factual allegations against these defendants.

IX. CLAIM FILING

291. In answer to Paragraph 291, SCORE Defendants object that this paragraph is a conclusion of law and is denied on that basis. These Defendants admit a claim has not been accepted by the SCORE Defendants.

X. PRAYER FOR RELIEF

The SCORE defendants deny Plaintiffs are entitled to the relief they seek in paragraphs A – L of the Prayer for Relief.

By way of FURTHER ANSWER and AFFIRMATIVE DEFENSES, SCORE defendants allege:

1. That the plaintiffs have failed to state a claim for which relief can be granted against these defendants.

2. That qualified immunity precludes plaintiffs' claims.

3. That the public duty doctrine and qualified and/or good faith immunity preclude plaintiffs' state law claims.

4. That the plaintiffs' comparative fault proximately caused their damages, if any.

5. That the plaintiffs failed to mitigate their damages, if any.

6. That the plaintiffs failed to exhaust applicable administrative remedies prior to filing suit.

1 7. That the plaintiffs' damages, if any, were caused by fault of parties not in the
2 control of SCORE Defendants or non-parties not in the control of SCORE Defendants.

3 8. That sovereign immunity precludes plaintiffs' claims.

4 SCORE Defendants expressly reserve the right to amend this Answer, including the
5 addition of affirmative defenses warranted by investigation and discovery, and to make such
6 amendments either before or during trial, including asserting other defense theories or
7 conforming the pleadings to the proof offered at the time of trial.

8 WHEREFORE, defendants pray as follows:

9 1. That plaintiff's Complaint be dismissed with prejudice and that plaintiff take
10 nothing by his Complaint and that defendants be allowed their costs and reasonable attorneys'
11 fees herein.
12

13 DATED this 26th day of March, 2020.

14 LAW, LYMAN, DANIEL,
15 KAMERRER & BOGDANOVICH, P.S.

16 *s/ John E. Justice*

17 _____
18 John E. Justice, WSBA No 23042
19 Attorney for SCORE Defendants
20 E-mail: jjjustice@lldkb.com

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury under the laws of the United States of America that on this date, I caused to be electronically filed the foregoing document, and this Certificate of ECF Filing & Service, with the Clerk of the Court using the CM/ECF system, who will send notification of such filing to the following party:

Attorneys for Plaintiffs:

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WILLIAMS KASTNER

Heidi L. Mandt, hmandt@williamskastner.com

DATED this 26th day of March 2020, at Tumwater, Washington.

s/ Lisa Gates
