

The Honorable Marsha J. Pechman

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

THE UNITED STATES OF AMERICA;  
DONALD TRUMP, in his official capacity as  
President of the United States of America,  
et al.,

Defendants.

NO. 2:18-cv-00939-MJP

DECLARATION OF LAURA K.  
CLINTON IN SUPPORT OF MOTION  
TO EXPEDITE

I, Laura K. Clinton, declare as follows:

1. I am over the age of 18 and have personal knowledge of all the facts stated herein.
2. I am an Assistant Attorney General and counsel of record for the State of Washington in this matter.
3. Attached hereto as **Exhibit A** is a true and correct copy of the June 7, 2018 letter of Governor Jay Inslee and Washington State Attorney General Bob Ferguson to Annette L. Hayes, Acting United States Attorney; Dan Sprout, Warden, Federal Detention Center-Sea Tac;

1 and Bryan Wilcox, Acting Seattle Field Officer Director for Immigration and Customs  
2 Enforcement.

3 4. Attached hereto as **Exhibit B** is a true and correct copy of the June 18, 2018,  
4 letter of Governor Jay Inslee and Washington State Attorney General Bob Ferguson to U.S.  
5 Attorney General Jefferson Sessions and Department of Homeland Security (DHS) Secretary  
6 Kirstjen Nielsen.

7 5. Attached hereto as **Exhibit C** is a true and correct copy of the June 19, 2018,  
8 letter to U.S. Attorney General Sessions and DHS Secretary Nielsen, signed by the Attorneys  
9 General of New Mexico, California, Connecticut, Delaware, District of Columbia, Hawaii,  
10 Illinois, Iowa, Maine, Maryland, Massachusetts, Minnesota, New Jersey, New York, North  
11 Carolina, Oregon, Pennsylvania, Rhode Island, Vermont, Virginia, and Washington.

12 6. Attached as **Exhibit D** is a true and correct copy of the June 25, 2018, Department  
13 of Health and Human Services (HHS) Assistant Secretary of Preparedness and Response's map  
14 entitled "Separated UAC Count by State."  
15

16 7. Attached as **Exhibit E** is a true and correct copy of the June 21, 2018, Temporary  
17 Restraining Order and Order to Show Cause [4] entered in *Gustavo Rodriguez Castillo, et al. v.*  
18 *Kirstjen Nielsen, et al.*, Case No. CV 5:18-01317-ODW-MAA (C.D. Cal.), Dkt. 10.

19 8. Attached as **Exhibit F** is a true and correct copy of the June 24, 2018, New York  
20 Times article, *More Than 500 Migrant Children Reunited With Adults, Government Says*,  
21 authored by Jennifer Jett and Mihir Zaveri.  
22

23 9. Attached as **Exhibit G** is a true and correct copy of the June 21, 2018, Politico  
24 article, *Feds don't have enough beds for migrant families*, authored by Ted Hesson and Wesley  
25 Morgan.  
26

1           10. Attached as **Exhibit H** is a true and correct copy of the June 25, 2018, Bloomberg  
2 article, *Border Patrol Halts Prosecution of Families Crossing Illegally*, authored by Shannon  
3 Pettypiece and Toluse Olorunnipa.

4           11. Attached as **Exhibit I** is a true and correct copy of the June 25, 2018, Press  
5 Briefing by Press Secretary Sarah Sanders.

6           12. Attached as **Exhibit J** is a true and correct copy of the June 24, 2018, tweet of  
7 President Donald Trump.

8           13. Attached as **Exhibit K** is a true and correct copy of the June 22, 2018, letter to  
9 Inspectors General Kelly and Levinson signed by more than 120 Democratic lawmakers.

10           14. Attached as **Exhibit L** is a true and correct copy of the June 22, 2018, letter from  
11 Representative Elijah Cummings and several other members from the House Oversight  
12 Committee to DHS Secretary Kirstjen Nielsen, HHS Secretary Alex Azar, and Attorney General  
13 Jeff Sessions.

14           15. Attached as **Exhibit M** is a true and correct copy of the June 27, 2018, letter from  
15 over 75 lawmakers to HHS Secretary Alex Azar and Director of Office of Refugee Resettlement  
16 Scott Lloyd.

17           16. Attached as **Exhibit N** is a true and correct copy of the June 21, 2018, Washington  
18 Post article, *The chaotic effort to reunite immigrant parents with their separated kids*, authored  
19 by Kevin Sieff.

20           17. Attached as **Exhibit O** is a true and correct copy of the June 24, 2018, New York  
21 Times Article, *Teenager Is Missing After Walking Away From Migrant Children's Center in*  
22 *Texas*, authored by Mihir Zaveri and Manny Fernandez.  
23  
24  
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18. Attached as **Exhibit P** is a true and correct copy of the June 29, 2018, Notice of Compliance filed by Defendants in *Flores, et al. v. Sessions, et al.*, Case No. CV 85-4544-DMG (C.D. Cal.), Dkt. 447.

I declare under penalty of perjury under the laws of the State of Washington and the United States of America that the foregoing is true and correct.

DATED this 2nd day of July, 2018, at Seattle, Washington.

/s/ Laura K. Clinton

LAURA K. CLINTON

Assistant Attorney General