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The Honorable MARSHA J. PECHMAN

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

A.B., by and through her next friend  
CASSIE CORDELL TRUEBLOOD, et al.,

Plaintiffs,

v.

WASHINGTON STATE DEPARTMENT OF  
SOCIAL AND HEALTH SERVICES, et al.,

Defendants.

NO. 14-cv-01178-MJP

JOINT MOTION FOR APPROVAL  
OF SETTLEMENT AGREEMENT

NOTE ON MOTION CALENDAR:  
June 14, 2024<sup>1</sup>

**I. MOTION**

The parties jointly move for this Court’s approval of and adoption of the Settlement Agreement submitted to this Court under Dkt. No. 1127. The bases for the Settlement Agreement are set forth in the parties’ Recitals under the Settlement Agreement. Dkt. No. 1127-2, at 1-3. A proposed order accompanies this motion.

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<sup>1</sup> This motion is noted on the date filed per LCR 7(d)(1). The parties, however, do not object if this matter is reset by the Court for the status conference scheduled in this matter on June 24, 2024.

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Respectfully submitted this 14th day of June 2024.

ROBERT W. FERGUSON  
Attorney General

s/ Daniel J. Judge  
DANIEL J. JUDGE, WSBA No. 17392  
Senior Counsel  
MARKO PAVELA, WSBA No. 49160  
ANTHONY VAUPEL, WSBA No. 47848  
TRAVIS KUHNS, WSBA No. 53219  
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Seattle, WA 98104  
*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I, *Christine Townsend*, state and declare as follows:

I am a citizen of the United States of America and over the age of 18 years and I am competent to testify to the matters set forth herein. I hereby certify that on this 14th day of June 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Chloe Merino: chloem@dr-wa.org

Kimberly Mosolf: kmosolf@gmail.com

Christopher Carney: Christopher.Carney@CGILaw.com

Sean Gillespie: Sean.Gillespie@CGILaw.com

David JW Hackett: david.hackett@kingcounty.gov

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Dated this 14th day of June 2024, at McCleary, Washington.

  
CHRISTINE TOWNSEND  
Paralegal

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