

Honorable Ronald B. Leighton

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

THERESA DOE, parent and legal guardian for
M.D., a minor,

Plaintiff,

v.

GRAYS HARBOR COUNTY, a municipality;
GERALD MURPHY, GREG REYNVAAN,
and JOHN and JANE DOES, in their individual
capacity,

Defendants.

Case No. 3:17-cv-05186-RBL

DECLARATION OF DAVID WHEDBEE
IN SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF MINOR
SETTLEMENT

Noted for November 9, 2017

I, David J. Whedbee, declare as follows:

I am one of the attorneys for Plaintiff. I am over the age of 18, and am competent to
testify.

1. Attached as Exhibit 1 is a true copy of the Report by Guardian Ad Litem, Jo-
Hanna Read., regarding the settlement in this matter.

2. Attached as Exhibit 2 is a true copy of the report by Plaintiff's Expert, Dr. Louis
Kraus, MD, provided to Defendants in this matter.

3. Attached as Exhibit 3 is a true copy of the Settlement Agreement between M.D.
and Grays Harbor County, executed on June 26, 2017.

DEC OF WHEDBEE IN SUPPORT OF MOTION FOR
APPOINTMENT OF GAL FOR MINOR CHILD, W.C. - 1

No. 2:11-cv-1217 RAJ

2098.7 kk061407

MACDONALD HOAGUE & BAYLESS
705 Second Avenue, Suite 1500
Seattle, Washington 98104
Tel 206.622.1604 Fax 206.343.3961

5. Attached as Exhibit 5 is a true copy of revised Policies and Procedures for the Grays Harbor County Juvenile Detention Center, and cover letter, dated October 13, 2017.

6. Attached as Exhibit 6 is a true copy of an email between Plaintiff's counsel and defense counsel setting forth additional aspects of the agreed-to revisions to County policies and procedures, dated October 23, 2017.

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

DATED this 9th day of November, 2017, at Seattle, Washington.

s/David J. Whedbee
David J. Whedbee, WSBA # 35977

CERTIFICATE OF SERVICE

I certify that on the date noted below I electronically filed this document entitled
**Declaration of David Whedbee in Support of Plaintiff's Motion for Approval of Minor
Settlement** with the Clerk of the Court using the CM/ECF system which will send notification of
such filing to the following persons:

Counsel for Defendants:

Suzanne Kelly Michael
Kathleen A. Kline
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Seattle, WA 98101
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kathleen@michaelandalexander.com

DATED this 9th day of November, 2017, at Seattle, Washington.

s/Terri Flink
Terri Flink, Legal Assistant