

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

DONALD BANGO and SCOTT BAILEY,
individually and on behalf of all others
similarly situated;

Plaintiffs,

v.

PIERCE COUNTY, WASHINGTON; BRUCE
DAMMEIER, in his official capacity as Pierce
County Executive; PIERCE COUNTY SHERIFF'S
DEPARTMENT; PAUL A. PASTOR, in his official
capacity as Pierce County Sheriff; PATTI
JACKSON-KIDDER, in her official capacity as
the Pierce County Chief of Corrections; JANET
RHOTON, in her official capacity as the Pierce
County Jail Mental Health Manager, and their
officers, agents, employees, and successors;

Defendants.

NO. 3:17-cv-06002

DECLARATION OF SALVADOR A. MUNGIA
IN SUPPORT OF MOTION FOR CLASS
CERTIFICATION

NOTED FOR: JANUARY 5, 2018

ORAL ARGUMENT REQUESTED

Pursuant to 28 U.S.C. § 1746, I, Salvador A. Mungia, declare and state as follows.

1 1. I was admitted to practice law in the State of Washington in 1984. I am
2 partner with the law firm of Gordon, Thomas, Honeywell where I have practiced since
3 1986. I am counsel of record for Plaintiffs in this case.

4 2. I graduated with honors from Georgetown University Law Center in 1984. I
5 am admitted to practice before this Court, the U.S. District Court for the Eastern District of
6 Washington, the U.S. Court of Appeals for the Ninth Circuit, and the U.S. Supreme Court.

7 3. I have been rated AV Premium by Martindale-Hubbell for over ten years. I
8 have been listed in "The Best Lawyers in America" for over five years. I am a member of
9 the American Board of Trial Advocates.

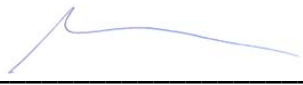
10 4. I was one of the lead attorneys in the 1995 lawsuit against Pierce County
11 representing inmates who had claims arising out of the conditions and treatment at the
12 Pierce County jail. The plaintiffs in that lawsuit moved for class certification for the then-
13 current and for future inmates of the Pierce County jail. This Court granted the motion for
14 class certification.

15 5. Ms. Janelle Chase-Fazio is an associate with Gordon Thomas Honeywell.
16 She graduated from the University of Washington School of Law in 2016 with honors and
17 joined Gordon Thomas Honeywell that same year. Ms. Chase-Fazio is admitted to practice
18 law in Washington State and in this court.

19 6. In cooperation with the ACLU-WA, Gordon Thomas Honeywell has the
20 capacity to thoroughly and vigorously litigate the claims in this case and properly
21 represent the plaintiff class. Gordon Thomas Honeywell will commit all necessary
22 resources to do so. If appointed class counsel Ms. Chase-Fazio and I will ensure that we
23 zealously represent the interests of the class to the best of our collective ability.
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1 I DECLARE UNDER PENALTY OF PREJURY UNDER THE LAW OF THE UNITED STATES
2 OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

3 Signed this 6th day of December, 2017, in Tacoma, Washington.

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5 By 

6 Salvador A. Mungia, WSBA No. 14807
7 smungia@gth-law.com
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