

The Honorable Robert S. Lasnik

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UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

SUSAN SOTO PALMER, et al.,  
  
Plaintiffs,  
  
v.  
  
STEVEN HOBBS, et al.,  
  
Defendants.  
  
And  
  
JOSE TREVINO, ISMAEL CAMPOS, and  
ALEX YBARRA,  
  
Intervenor-Defendants

CASE NO. 3:22-cv-05035 RSL

DECLARATION OF JEANNIE  
GORRELL IN OPPOSITION TO  
PLAINTIFF'S MOTION TO ENFORCE  
SUBPOENA OF JIM TROYER OR  
ALTERNATIVELY TO EXTEND  
DISCOVERY DEADLINE FOR  
COMPLIANCE AND PERMIT  
DEPOSITION

Noted: January 27, 2023

I, Jeannie Gorrell, hereby declare as follows:

1. I am in-house counsel to the Washington State Senate. I am over the age of 18 and am competent to testify as to the following based upon personal knowledge.

2. For all of the document subpoenas Plaintiffs served on legislators and legislative staff from April through November 2022, the Legislature voluntarily produced responsive records. I have been substantially involved in locating, reviewing, and preparing Legislative records for voluntary production in connection with Plaintiffs' subpoenas to individual legislators and legislative staff. None of the subjects of these subpoenas possess, have custody of, or control

1 legislative records. This has been a considerable undertaking for me and my legislative staff  
2 colleagues. Given my and our obligations while the Legislature is in session, we do not have the  
3 time or resources to produce additional records either voluntarily or compulsorily.

4 I declare under penalty of perjury under all applicable law that, to the best of my  
5 knowledge, information and belief, the foregoing is true and correct.

6 EXECUTED this 21<sup>st</sup> day of January, 2023, at Olympia, Washington.  
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10 JEANNIE GORRELL  
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