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DECLARATION OF MAILING/DELIVERY

The undersigned certifies under penalty of perjury under the laws of State of Washington, that on the below date, I mailed, or caused delivery of, a true copy of the foregoing on: Jeff Friemund & Kelly Corr at the regular office or residence thereof.

DATED this 15<sup>th</sup> day of June, 2001.

Lonnie Clement

**IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF WHATCOM**

JESSICA BRAAM, a minor child, by and )  
Through her guardians, Dale and Vickie )  
Braarn; JENNEIVA BURSCH, a minor child, )  
by and through her guardians, Greg & Sherry )  
Bursch; CASSIDEE BURSCH, a minor child, by )  
and through her guardians Greg & Sherry )  
Bursch; DESI MORGAN, a minor child, by )  
and through her guardians, Lori Morgan )  
and Lonnie Morgan; PATRICK MORRIS, a )  
minor child, by and through his guardians, )  
Kathy and David Morris; TIM OLSON, a )  
minor child, by and through his guardians, )  
David and Diane Olson; SHAUN SANCHEZ, )  
a minor child, by and through his court )  
appointed GAL, Shawn Hosford; AMIE )  
ANDERSON, a minor child, by and through )  
her court appointed GAL, Jim Haynes, )  
ROBYN BRANDON, a minor child, by and )  
through her guardian, E. Sparrowhawk Brandon; )  
BETH HARDIN, a minor child, by and through )  
her guardians, David and Mary Hardin; )  
ERYK HARDIN, a minor child, by and through )  
his guardians, David and Mary Hardin; )  
IVORY HARDIN, a minor child, by and through )  
her guardians, David and Mary Hardin; )  
EBONY HARDIN, a minor child, by and through )  
her guardians, David and Mary Hardin, )

No. 98 2 01570 1

PLAINTIFFS ' )  
MOTION FOR )  
BIFURCATION )

David A. Nichols

MOTION FOR BIFURCATION - PAGE 1

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	Plaintiffs,	)
v.		)
		)
STATE OF WASHINGTON and the		
DEPARTMENT OF SOCIAL AND		;
HEALTH SERVICES, and LYLE QUASIM,		
Individually, and as Secretary of the		;
Department of Health and Human Services		>
	Defendants.	;
		)

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Come now the Plaintiffs, by and through their counsel Brett & Daugert, PLLC, Timothy C. Farris of counsel, and The National Center for Youth Law, William Grimm of counsel, and move the Court to bifurcate this proceeding into 1) claims for injunctive relief followed by 2) a subsequent proceeding on the children's claims for damages. This motion is based on the accompanying Memorandum In Support of Motion for Bifurcation and the records and files herein.

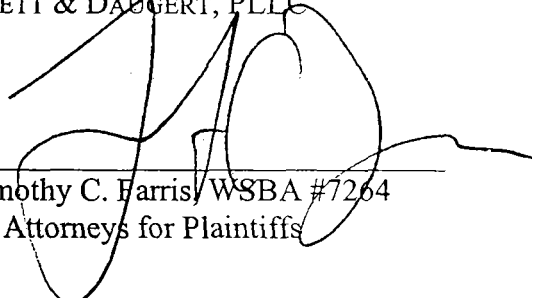
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DATED this \_\_\_\_\_ day of June, 2001.

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BRETT & DAUGERT, PLLC

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\_\_\_\_\_  
Timothy C. Farris, WSBA #7264  
Of Attorneys for Plaintiffs

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MOTION FOR BIFURCATION ~ PAGE 2

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