

Exhibit 1

From: [Melody Colleen \(ATG\)](#)
To: kerry.keefe@usdoj.gov
Cc: [Clinton, Laura \(ATG\)](#)
Subject: 2:18-cv-939-MJP: Conference re: discovery motion
Date: Friday, June 29, 2018 12:06:19 PM

Kerry:

I am counsel of record for Washington State in *State of Washington v. United States*, No. 2:18-cv-939-MJP, a suit filed Tuesday and served Wednesday in the Western District of Washington. The suit challenges several policies involving family separation and detention by federal immigration officials.

I write to confer regarding the Plaintiff States' planned request to the Court for expedited discovery. The motion will request that the Court set an expedited discovery schedule so that Plaintiffs may obtain discovery about separated parents and children in our States, the processing of asylum applications at the southern border, and the current process(es) ICE and HHS are using to reunify families. The motion will further request an order requiring that Defendants cooperate with the Plaintiff States in providing access to detained parents in their respective jurisdictions, if such parents wish to speak with State investigators, and an order setting weekly status conferences during the period of expedited discovery. We plan to file the motion Monday.

After reaching out to the Western District of Washington yesterday and today, we understand that the case may be handled out of D.C. and I may need to confer with counsel there.

I hope that DOJ would consider stipulating to this request. If DOJ is not open to stipulation, I request a statement of the government's position on the motion.

Sincerely,

Colleen

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