

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON;
COMMONWEALTH OF
MASSACHUSETTS; STATE OF
CALIFORNIA; STATE OF MARYLAND;
STATE OF OREGON; STATE OF NEW
MEXICO; COMMONWEALTH OF
PENNSYLVANIA; STATE OF NEW
JERSEY; STATE OF IOWA; STATE OF
ILLINOIS; STATE OF MINNESOTA;
STATE OF RHODE ISLAND;
COMMONWEALTH OF VIRGINIA;
STATE OF NEW YORK; STATE OF
VERMONT; STATE OF NORTH
CAROLINA; STATE OF DELAWARE;
AND THE DISTRICT OF COLUMBIA,

Plaintiffs,

v.

THE UNITED STATES OF AMERICA;
DONALD TRUMP, in his official capacity
as President of the United States of
America; U.S. DEPARTMENT OF
HOMELAND SECURITY; U.S.
IMMIGRATION AND CUSTOMS
ENFORCEMENT; U.S. CUSTOMS AND
BORDER PROTECTION; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. DEPARTMENT OF
HEALTH AND HUMAN SERVICES;
OFFICE OF REFUGEE RESETTLEMENT;
KIRSTJEN NIELSEN, in her official
capacity as Secretary of the U.S. Department
of Homeland Security; THOMAS HOMAN,

NO. 2:18-cv-00939

NOTICE OF RELATED CASES

1 in his official capacity as Acting Director of
2 U.S. Immigration and Customs
3 Enforcement; KEVIN K. MCALEENAN, in
4 his official capacity as Commissioner of
5 U.S. Customs and Border Protection; ALEX
6 AZAR, in his official capacity as Secretary
7 of U.S. Department of Health and Human
8 Services; SCOTT LLOYD, in his official
9 capacity as Director of Office of Refugee
10 Resettlement; and JEFFERSON
11 BEAUREGARD SESSIONS III, in his
12 official capacity as the Attorney General of
13 the United States,

14 Defendants.

15 Pursuant to LCR 3(g)(1), the State of Washington hereby submits this notice of a
16 pending, related case in the Western District of Washington. The related case is *Padilla et al. v.*
17 *US Immigration and Customs Enforcement et al.*, 2:18-cv-00928, assigned to Presiding Judge
18 Marsha J. Pechman. That case challenges the same family separation policy and course of conduct
19 that forms the gravamen of this Action, and involves substantially the same Defendant federal
20 agencies and officers.

21 While the Plaintiffs, claims, and remedies are not coextensive between the two cases, it
22 is likely that there will be significant overlap in legal argument and potentially similar evidence
23 across the two actions. It appears very likely that there would be an unduly burdensome
24 duplication of labor and expense or the potential for conflicting results if the cases were conducted
25 before different judges.
26

1 Respectfully submitted this 26th day of June, 2018.

2 ROBERT W. FERGUSON
3 Attorney General of Washington

4 */s/Laura K. Clinton*

5 LAURA K. CLINTON, WSBA #29846

6 Assistant Attorney General

7 NOAH G. PURCELL, WSBA #43492

8 Solicitor General

9 COLLEEN M. MELODY, WSBA #42275

10 MEGAN D. LIN, WSBA #53716

11 Assistant Attorneys General

12 Attorneys for Plaintiff State of Washington