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KING COUNTY
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CASE #: 25-2-14362-7 SEA

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR KING COUNTY

Case No. 25-2-14362-7

**DEFENDANTS' ANSWER AND
AFFIRMATIVE DEFENSES TO
PLAINTIFFS' COMPLAINT**

A.A., A.A.2, A.A.3, A.C., A.E., A.F., A.H.,
A.H.2, A.H.3, A.J., A.K., A.L., A.M., A.N.,
A.P., A.P.2, A.P.3, A.R., A.S., A.S.2, A.S.3,
A.W., B.A., B.A.2, B.B., B.E., B.F., B.H.,
B.H.2, B.K., B.K.2, B.K.3, B.N., B.R., B.U.,
B.U.2, B.V., B.W., C.A., C.B., C.C., C.C.2,
C.C.3, C.C.4, C.D., C.F., C.G., C.H., C.H.2,
C.J., C.K., C.L., C.L.2, C.M., C.M.2, C.M.3,
C.Q., C.R., C.R.2, C.S., C.T., C.V., C.W.,
C.Y., D.B., D.B.2, D.F., D.H., D.H.2, D.H.3,
D.J., D.K., D.L., D.M., D.P., D.R., D.S.,
D.S.2, D.S.3, D.S.4, E.B., E.B.2, E.C., E.H.,
E.S., E.S.2, E.W., E.W.2, F.A., F.A.2, F.P.,
F.S., G.B., G.F., G.R., G.W., H.B., H.D., H.G.,
H.H., H.Y., I.A., I.B., I.M., J.B., J.B.2, J.B.3,
J.B.4, J.C., J.C.2, J.D., J.D.2, J.D.3, J.D.4, J.F.,
J.F.2, J.F.3, J.F.4, J.G., J.G.2, J.G.3, J.G.4,
J.H., J.H.2, J.H.3, J.H.4, J.I., J.K., J.K.2, J.L.,
J.L.2, J.L.3, J.M., J.M.2, J.M.3, J.M.4, J.N.,
J.O., J.O.2, J.P., J.P.2, J.P.3, J.P.4, J.Q., J.S.,
J.S.2, J.S.3, J.S.4, J.S.5, J.S.6, J.S.7, J.S.8,
J.S.9, J.S.10, J.T., J.T.2, J.W., J.W.2, J.W.3,
J.W.4, K.A., K.F., K.H., K.M., K.M.2, K.P.,
K.P.2, K.P.3, K.S., K.S.2, K.S.3, K.S.4, K.T.,
L.C., L.D., L.F., L.H., L.K., L.R., L.S., L.S.2,
L.S.3, L.W., M.B., M.C., M.C.2, M.D., M.F.,
M.G., M.G.2, M.H., M.H.2, M.J., M.K., M.L.,
M.M., M.N., M.O., M.P., M.P.2, M.P.3, M.S.,
M.V., N.B., N.B.2, N.E., N.L., N.M., N.M.2,
N.M.3, N.S., N.S.2, P.A., P.D., P.L., P.M.,
P.O., P.T., P.W., Q.B., R.A., R.A.2, R.A.3,
R.B., R.B.2, R.C., R.D., R.D.2, R.G., R.G.2,
R.G.3, R.J., R.L., R.L.2, R.M., R.M.2, R.N.,
R.N.2, R.P., R.R., R.R.2, R.R.3, R.S., R.S.2,
R.S.3, R.W., R.W.2, S.B., S.C., S.C.2, S.C.3,
S.D., S.E., S.G., S.K., S.K.2, S.L., S.M.,

1 S.M.2, S.P., S.V., T.B., T.C., T.D., T.E., T.F.,
2 T.H., T.J., T.K., T.K.2, T.L., T.M., T.M.2,
3 T.M.3, T.N., T.P., T.R., T.R.2, T.V., T.W.,
4 T.W.2, T.W.3, U.H., V.M., V.P., V.P.2, V.S.,
5 V.S.2, V.T., W.H., W.M., W.M.2, W.W.,
6 Z.H., Z.K., individuals,

Plaintiffs,

v.

7 THE STATE OF WASHINGTON and its
8 agencies, DEPARTMENT OF CHILDREN,
9 YOUTH, AND FAMILY, DEPARTMENT
10 OF SOCIAL AND HEALTH SERVICES, and
11 JUVENILE REHABILITATION
12 ADMINISTRATION,

Defendants.

13 Defendants State of Washington through its agencies Department of Children, Youth, and
14 Families, Department of Social and Health Services, and Juvenile Rehabilitation Administration
15 (collectively, "Defendants"), by and through their undersigned counsel of record, hereby appear
16 in the above-entitled matter in answer to Plaintiffs' Complaint, and admit, deny, and allege as
17 follows:

18 I. INTRODUCTION

19 1.1. The allegations in Paragraph 1.1 of the Complaint contain legal arguments and
20 legal conclusions to which no response is required. To the extent a response is required,
21 Defendants deny the allegations contained therein.

22 1.2. The allegations in Paragraph 1.2 of the Complaint contain legal arguments and
23 legal conclusions to which no response is required. To the extent a response is required,
24 Defendants deny the allegations contained therein.

25 1.3. The allegations in Paragraph 1.3 of the Complaint contain legal arguments and
26 legal conclusions to which no response is required. To the extent the Paragraph and associated
27 footnotes reference specific publications and reference materials, Defendants admit that the
contents of the publications speak for themselves, and Defendants neither admit nor deny the

1 accuracy of those publications. Furthermore, Defendants deny that all information contained in
2 those allegations is accurate at the present time, even if it was accurate at the time of publication.
3 Finally, to the extent a response is required to this Paragraph, Defendants deny the allegations
4 therein.

5 1.4. The allegations in Paragraph 1.4 of the Complaint contain legal arguments and
6 legal conclusions to which no response is required. To the extent a response is required,
7 Defendants deny the allegations contained therein.

8 1.5. The allegations in Paragraph 1.5 of the Complaint contain legal arguments and
9 legal conclusions to which no response is required. To the extent a response is required,
10 Defendants deny the allegations contained therein.

11 1.6. Defendants admit employees have been the subject of criminal and civil actions.
12 Defendants deny the remaining allegations in Paragraph 1.6.

13 1.7. The allegations in Paragraph 1.7 of the Complaint contain legal arguments and
14 legal conclusions to which no response is required. To the extent a response is required,
15 Defendants deny the allegations contained therein.

16 II. PARTIES

17 2.1. Defendants admit that the Department of Children, Youth, and Families
18 (“DCYF”) and the Department of Social and Health Services (“DSHS”) are agencies of the State
19 of the Washington. Defendants deny that Juvenile Rehabilitation Administration (“JRA”) is a
20 separate agency of the State of Washington because it joined with DCYF in 2019 and is not a
21 separate agency. DCYF and DSHS are therefore the real parties in interest. The remaining
22 allegations in Paragraph 2.1 of the Complaint contain legal arguments and legal conclusions to
23 which no response is required. To the extent a response is required, Defendants deny the
24 allegations contained therein.

25 2.2. The allegations in Paragraph 2.2 of the Complaint contain legal arguments and
26 legal conclusions to which no response is required. To the extent a response is required,
27 Defendants deny the allegations contained therein.

1 2.3. The allegations in Paragraph 2.3 of the Complaint contain legal arguments and
2 legal conclusions to which no response is required. To the extent a response is required,
3 Defendants deny the allegations contained therein.

4 **III. JURISDICTION AND VENUE**

5 3.1. Defendants admit the Superior Court generally has jurisdiction of this case, but
6 deny King County is the proper venue for this action.

7 3.2. Defendants deny venue is proper in King County.

8 **IV. STATUTE OF LIMITATIONS**

9 4.1. The allegations in Paragraph 4.1 of the Complaint contain legal arguments and
10 legal conclusions to which no response is required. To the extent a response is required,
11 Defendants deny the allegations contained therein.

12 **V. BACKGROUND INFORMATION**

13 5.1. The allegations in Paragraph 5.1 of the Complaint contain legal arguments and
14 legal conclusions to which no response is required. To the extent the Paragraph references
15 specific Session Laws for the State of Washington and state laws, those laws speak for
16 themselves.

17 5.2. The allegations in Paragraph 5.2 of the Complaint contain legal arguments and
18 legal conclusions to which no response is required. To the extent the Paragraph references
19 specific Session Laws for the State of Washington, those laws speak for themselves.

20 5.3. The allegations in Paragraph 5.3 of the Complaint contain legal arguments and
21 legal conclusions to which no response is required. To the extent the Paragraph references
22 specific Session Laws for the State of Washington and case law, those references speak for
23 themselves.

24 5.4. The allegations in Paragraph 5.4 of the Complaint contain legal arguments and
25 legal conclusions to which no response is required. To the extent the Paragraph references
26 specific Session Laws for the State of Washington, those laws speak for themselves.

1 5.5. The allegations in Paragraph 5.5 of the Complaint contain legal arguments and
2 legal conclusions to which no response is required. To the extent the Paragraph references
3 specific Session Laws for the State of Washington, those laws speak for themselves.

4 5.6. The allegations in Paragraph 5.6 of the Complaint contain legal arguments and
5 legal conclusions to which no response is required. To the extent the Paragraph references
6 specific Session Laws for the State of Washington, those laws speak for themselves.

7 5.7. The allegations in Paragraph 5.7 of the Complaint contain legal arguments and
8 legal conclusions to which no response is required. To the extent the Paragraph references
9 specific Session Laws for the State of Washington, those laws speak for themselves.

10 5.8. The allegations in Paragraph 5.8 of the Complaint contain legal arguments and
11 legal conclusions to which no response is required. To the extent the Paragraph references
12 specific Session Laws for the State of Washington, those laws speak for themselves.

13 5.9. Defendants admit that they operated or operates two facilities named Green Hill
14 School and Maple Lane School. Defendants admit that Green Hill School is located in Chehalis
15 but Maple Lane School is located in Centralia, Thurston County. The remaining allegations in
16 Paragraph 5.9 of the Complaint contain legal arguments and legal conclusions to which no
17 response is required. The Session Laws and state laws for the State of Washington cited in the
18 Complaint speak for themselves.

19 5.10. The allegations in Paragraph 5.10 of the Complaint contain legal arguments and
20 legal conclusions to which no response is required. To the extent the Paragraph references
21 specific publications and reference materials, case law and state laws, Defendants admit that the
22 contents of the publications speak for themselves, and Defendants neither admit nor deny the
23 accuracy of those publications.

24 5.11. The allegations in Paragraph 5.11 of the Complaint contain legal arguments and
25 legal conclusions to which no response is required. Defendants deny the remaining allegations
26 in Paragraph 5.11.

1 5.12. The allegations in Paragraph 5.12 of the Complaint contain legal arguments and
2 legal conclusions to which no response is required. To the extent the Paragraph references
3 specific Session Laws and state laws for the State of Washington, those laws speak for
4 themselves. Defendants admit that, by the 1980s, they operated the facilities listed in Paragraph
5 5.12, some of which were juvenile correctional facilities. Defendants deny that all the facilities
6 listed were juvenile correctional facilities.

7 5.13. The allegations in Paragraph 5.13 of the Complaint contain legal arguments and
8 legal conclusions to which no response is required. To the extent the Paragraph references
9 specific Session Laws and statutes for the State of Washington, those laws speak for themselves.

10 5.14. Defendants admit that DCYF was created in 2017 by the Washington State
11 Legislature, and functions performed by the Children's Administration within DSHS were
12 transferred, along with all liabilities, to DCYF on July 1, 2018. To the extent the Paragraph
13 references specific Session Laws for the State of Washington, those laws speak for themselves.

14 5.15. Defendants admit that JRA moved to DCYF in 2019. Defendants deny the
15 remaining allegations in Paragraph 5.15.

16 5.16. The allegations in Paragraph 5.16 of the Complaint contain legal arguments and
17 legal conclusions to which no response is required. The allegations also include quotes to which
18 there is no attribution, making confirmation impossible. To the extent a response is required,
19 Defendants deny the allegations contained therein.

20 5.17. Defendants deny the allegations in Paragraph 5.17.

21 5.18. The allegations in Paragraph 5.18 of the Complaint contain legal arguments and
22 legal conclusions to which no response is required. To the extent a response is required,
23 Defendants deny the allegations contained therein.

- 24 a. Defendants admit that Echo Glen Children's Center is located in King County,
25 Washington. Defendants admit that Echo Glen Children's Center is a
26 medium/maximum state juvenile correctional facility that houses both male and
27

female individuals, including male and female youth. Defendants deny the remaining allegations in this Paragraph.

- b. Defendants admit that Green Hill School is located in Lewis County, Washington. Defendants admit that Green Hill School is a medium/maximum security state juvenile correctional facility that houses male individuals, including male youth. Defendants deny the remaining allegations in this Paragraph.
- c. Defendants admit Naselle Youth Camp was located in Pacific County, Washington, was a medium security state juvenile correctional facility that housed males. Defendants admit before its closure in 2022, Naselle Youth Camp partnered with the Washington State Department of Natural Resources and Department of Fish and Wildlife to facilitate work programs for the residents. Defendants deny the remaining allegations in this Paragraph.
- d. Defendants admit Maple Lane School is located in Thurston County, Washington and, at the time of its closure in 2011, was a medium/maximum security state juvenile correctional facility that housed male individuals, including male youth. Defendants further admit Maple Lane School housed female individuals, including female youth at the time it opened, but eventually transitioned to an all-male facility. Defendants further admit Maple Lane School reopened in 2016 and houses adult DSHS clients.
- e. Defendants admit Mission Creek Youth Camp was located in Mason County, Washington. Defendants admit Mission Creek Youth Camp was built on land leased from the Washington State Department of Natural Resources, which facilitated a work program for the residents. Defendants admit Mission Creek Youth Camp opened in 2005 as the Mission Creek Corrections Center for Women. Defendants deny the remaining allegations in this Paragraph.

- 1 f. Defendants admit that Indian Ridge Youth Camp was located in Snohomish
2 County, Washington. Defendants admit it was a state-operated facility housing
3 juvenile offenders. Defendants deny the remaining allegations in this Paragraph.
- 4 g. Defendants admit that Cascadia Juvenile Reception and Diagnostic Center was
5 located in Pierce County, Washington. Defendants admit it was a state-operated
6 facility for juvenile detainees. Defendants deny the remaining allegations in this
7 Paragraph.
- 8 h. Defendants admit that Sunrise Community Facility is located in Grant County,
9 Washington. Defendants admit it is a state-operated community facility for
10 juvenile offenders. Defendants deny the remaining allegations in this Paragraph.
- 11 i. Defendants admit that Woodinville Community Facility is located in King
12 County, Washington. Defendants admit it is a state-operated community facility
13 for juvenile offenders. Defendants deny the remaining allegations in this
14 Paragraph.
- 15 j. Defendants admit that Parke Creek Community Facility is located in Kittitas
16 County, Washington. Defendants admit it is a state-operated community facility
17 for juvenile offenders. Defendants deny the remaining allegations in this
18 Paragraph.
- 19 k. Defendants admit that Oakridge Community Facility is located in Pierce County,
20 Washington. Defendants admit it is a state-operated community facility for
21 juvenile offenders. Defendants deny the remaining allegations in this Paragraph.
- 22 l. Defendants admit that Canyon View is located in Douglas County near the border
23 with Chelan County, Washington. Defendants admit it is a state-operated
24 community facility for juvenile offenders. Defendants deny the remaining
25 allegations in this Paragraph.
- 26 m. Defendants admit that Touchstone Community Facility is located in Thurston
27 County, Washington. Defendants admit it is currently a state-operated

community facility for juvenile offenders. Defendants deny they have always operated Touchstone Community Facility. Defendants deny the remaining allegations in this Paragraph.

n. Defendants admit that Twin Rivers Community Facility is located in Benton County, Washington. Defendants admit it is a state-operated community facility for juvenile offenders. Defendants deny the remaining allegations in this Paragraph.

o. Defendants admit that Spruce Street Inn was located in King County, Washington. Defendants admit it was licensed to care for dependents in the custody of DCYF.

p. Defendants admit that Camp Outlook was located in Franklin County, Washington. Defendants admit it was a state-operated facility housing juvenile offenders. Defendants deny the remaining allegations in this Paragraph.

q. Defendants admit that Ridgeview Community Facility is located in Yakima County, Washington. Defendants admit it is a state-operated juvenile facility. Defendants deny the remaining allegations in this Paragraph.

r. Defendants admit that Fort Worden Diagnostic Center was located in Jefferson County, Washington. Defendants admit that it was a state-operated correctional juvenile treatment and diagnostic center.

s. Defendants admit Forest Ridge Lodge was located in Kitsap County, Washington. Defendants admit it was a state-contracted facility. Defendants deny the remaining allegations in this Paragraph.

t. Defendants admit that Jessie Dyslin Boys Ranch was located in Pierce County, Washington. Defendants admit it was a state-licensed facility. Defendants deny the remaining allegations in this Paragraph.

u. Defendants lack sufficient information to admit or deny the existence of Cushman House and therefore deny the allegations in this Paragraph.

1 5.19. Defendants admit they have a zero tolerance policy for all forms of sexual abuse
2 and sexual harassment of the children in their care. Defendants admit the remaining allegations
3 in paragraph 5.19.

4 5.20. The allegations in Paragraph 5.20, and its subparts, of the Complaint contain legal
5 arguments and legal conclusions to which no response is required. To the extent the Paragraph
6 references the Prison Rape Elimination Act (“PREA”), 34 U.S.C. 30301 *et seq.*, those laws speak
7 for themselves.

- 8 a. The allegations in this Paragraph contain legal arguments and legal conclusions to
9 which no response is required. This Paragraph cites 28 C.F.R. 115.6, which
10 speaks for itself.
- 11 b. The allegations in this Paragraph contain legal arguments and legal conclusions to
12 which no response is required. This Paragraph cites 28 C.F.R. 115.6, which
13 speaks for itself.
- 14 c. The allegations in this Paragraph contain legal arguments and legal conclusions to
15 which no response is required. This Paragraph cites 28 C.F.R. 115.6, which
16 speaks for itself.
- 17 d. The allegations in this Paragraph contain legal arguments and legal conclusions to
18 which no response is required. This Paragraph cites 28 C.F.R. 115.6, which
19 speaks for itself.
- 20 e. The allegations in this Paragraph contain legal arguments and legal conclusions to
21 which no response is required. This Paragraph cites 28 C.F.R. 115.6, which
22 speaks for itself.
- 23 f. The allegations in this Paragraph contain legal arguments and legal conclusions to
24 which no response is required. This Paragraph cites 28 C.F.R. 115.6, which
25 speaks for itself.
- 26
- 27

1 g. The allegations in this Paragraph contain legal arguments and legal conclusions to
2 which no response is required. This Paragraph cites 28 C.F.R. 115.6, which
3 speaks for itself.

4 h. The allegations in this Paragraph contain legal arguments and legal conclusions to
5 which no response is required. This Paragraph cites 28 C.F.R. 115.6, which
6 speaks for itself.

7 5.21. The allegations in Paragraph 5.21 of the Complaint contain legal arguments and
8 legal conclusions to which no response is required. To the extent the Paragraph references
9 Defendants' policies applying PREA juvenile standards, those policies speak for themselves.

10 5.22. The allegations in Paragraph 5.22 of the Complaint contain legal arguments and
11 legal conclusions to which no response is required. To the extent the Paragraph references
12 Defendants' policies applying PREA juvenile standards, those policies speak for themselves.

13 5.23. The allegations in Paragraph 5.23 of the Complaint contain legal arguments and
14 legal conclusions to which no response is required. To the extent the Paragraph references
15 Defendants' policies applying PREA juvenile standards, those policies speak for themselves.

16 5.24. Defendants admit Plaintiffs filed multiple public records requests seeking
17 documentation from the State of Washington. Defendants deny the remaining allegations of
18 Paragraph 5.24.

19 5.25. Defendants deny the allegations in Paragraph 5.25.

20 5.26. The allegations in Paragraph 5.26 of the Complaint contain legal arguments and
21 legal conclusions to which no response is required. To the extent the Paragraph references state
22 laws and case law, those laws speak for themselves.

23 5.27. The allegations in Paragraph 5.27 of the Complaint contain legal arguments and
24 legal conclusions to which no response is required. To the extent the Paragraph references state
25 laws, those laws speak for themselves.

26 5.28. Defendants deny the allegations in Paragraph 5.28.

27 5.29. Defendants deny the allegations in Paragraph 5.29.

1 5.30. Defendants deny the allegations in Paragraph 5.30.

2 5.31. Defendants deny the allegations in Paragraph 5.31.

3 5.32. Defendants deny the allegations in Paragraph 5.32.

4 5.33. Defendants admit the existence of the March 29, 2019 incident report contained in

5 Paragraph 5.33. That report speaks for itself. Defendants deny the remaining allegations in

6 Paragraph 5.33.

7 5.34. Defendants deny the allegations in Paragraph 5.34.

8 5.35. Defendants deny the allegations in Paragraph 5.35.

9 5.36. Defendants admit that Robert Heath Fox was a guard at Echo Glen and pleaded

10 guilty in 2009 to first-degree custodial sexual misconduct. Defendants admit that an employee

11 of DSHS was quoted as referring to Fox as a “depraved individual.” Defendants deny the

12 remaining allegations in Paragraph 5.36.

13 5.37. Defendants admit that Deanna Witters pleaded guilty to two counts of custodial

14 sexual misconduct. Defendants lack sufficient information to either admit or deny the words

15 Witters stated on the record in her testimony and therefore deny the same. Defendants deny the

16 accuracy of the statements attributed to Witters in Paragraph 5.37. Defendants deny the

17 remaining allegations in Paragraph 5.37.

18 5.38. Defendants admit that Kalia Jandoc was charged with custodial sexual

19 misconduct in 2014. Defendants deny the remaining allegations in Paragraph 5.38.

20 5.39. Defendants admit Mindi Stoker pleaded guilty to attempted assault and custodial

21 sexual misconduct. Defendants deny the remaining allegations in Paragraph 5.39.

22 5.40. Defendants admit they have a zero tolerance policy for all forms of sexual abuse

23 and sexual harassment of the children in their care. Defendants admit that an employee of DSHS

24 made statements in reference to Ms. Stoker. To the extent Paragraph 5.40 references quotes

25 from a publication, defendants admit that the publication speaks for itself, and defendants neither

26 admit nor deny the accuracy of the publication.

27

1 5.41. Defendants admit Erin Stiebritz (née Snodgrass) pleaded guilty to custodial sexual
2 misconduct in 2016. Defendants deny the remaining allegations in Paragraph 5.41.

3 5.42. Defendants lack sufficient information to either admit or deny the specific
4 statements attributed to Defendants in Paragraph 5.42 and therefore deny the same.

5 5.43. Defendants lack sufficient information to either admit or deny the specific
6 statement attributed to John Clayton in Paragraph 5.43 and therefore deny the same.

7 5.44. Defendants admit that a federal PREA audit of Green Hill School was completed
8 in 2019. That audit speaks for itself and Defendants neither admit nor deny the accuracy of the
9 information contained in the audit.

10 5.45. Paragraph 5.45 references the 2019 federal PREA audit of Green Hill School.
11 That audit speaks for itself and Defendants neither admit nor deny the accuracy of the
12 information contained in the audit.

13 5.46. Paragraph 5.46 references the 2019 federal PREA audit of Green Hill School.
14 That audit speaks for itself and Defendants neither admit nor deny the accuracy of the
15 information contained in the audit.

16 5.47. The allegations in Paragraph 5.47 of the Complaint contain legal arguments and
17 legal conclusions to which no response is required. To the extent the Paragraph references the
18 2019 PREA audit of Green Hill School, that audit speaks for itself and Defendants neither admit
19 nor deny the accuracy of the information contained in the audit.

20 5.48. The allegations in Paragraph 5.48 of the Complaint contain legal arguments and
21 legal conclusions to which no response is required. To the extent the Paragraph references the
22 2019 PREA audit of Green Hill School, that audit speaks for itself and Defendants neither admit
23 nor deny the accuracy of the information contained in the audit.

24 5.49. The allegations in Paragraph 5.49 contains legal arguments and legal conclusions
25 to which no response is required. To the extent the Paragraph references an audit conducted of
26 Green Hill School in 2022, that audit speaks for itself and Defendants neither admit nor deny the
27 accuracy of the information in the audit.

1 5.49.1 The allegations in Paragraph 5.49.1 contains legal arguments and legal
2 conclusions to which no response is required. To the extent the Paragraph references an audit
3 conducted of Green Hill School in 2022, that audit speaks for itself and Defendants neither admit
4 nor deny the accuracy of the information in the audit.

5 5.49.2 The allegations in Paragraph 5.49.2 contains legal arguments and legal
6 conclusions to which no response is required. To the extent the Paragraph references an audit
7 conducted of Green Hill School in 2022, that audit speaks for itself and Defendants neither admit
8 nor deny the accuracy of the information in the audit.

9 5.49.3 To the extent Paragraph 5.49.3 references an audit conducted of Green Hill
10 School in 2022, that audit speaks for itself and Defendants neither admit nor deny the accuracy
11 of the information in the audit.

12 5.49.4 To the extent Paragraph 5.49.4 references an audit conducted of Green Hill
13 School in 2022, that audit speaks for itself and Defendants neither admit nor deny the accuracy
14 of the information in the audit.

15 5.49.5 The allegations in Paragraph 5.49.5 contain legal arguments and legal
16 conclusions to which no response is required. To the extent the Paragraph references an audit
17 conducted of Green Hill School in 2022, that audit speaks for itself and Defendants neither admit
18 nor deny the accuracy of the information in the audit.

19 5.49.6 To the extent Paragraph 5.49.6 references an audit conducted of Green Hill
20 School in 2022, that audit speaks for itself and Defendants neither admit nor deny the accuracy
21 of the information in the audit.

22 5.50. Defendants admit Angel Misner was arrested for custodial sexual misconduct and
23 Emily Baker was arrested for abuse of office and tampering with a witness at Green Hill School.
24 The contents of any investigation documents referenced in Paragraph 5.50 speak for themselves.
25 Defendants lack sufficient information to either admit or deny the specific statements attributed
26 to any investigation in Paragraph 5.50 and therefore deny the same. Defendants admit an
27

1 employee was arrested in 2024 for selling methamphetamines and other contraband at Green Hill
2 School. Defendants deny the remaining allegations in Paragraph 5.50.

3 5.51. Defendants admit that two Green Hill employees were arrested in 2024, one for
4 allegedly facilitating an attack on a youth and the other for allegedly possessing a controlled
5 substance in a correctional facility.

6 5.52. Defendants admit that Dawn McLaughlin was arrested and charged with custodial
7 misconduct. The contents of any investigation documents referenced in Paragraph 5.52 speak
8 for themselves. Defendants lack sufficient information to either admit or deny the specific
9 statements attributed to any investigation in Paragraph 5.52 and therefore deny the same.
10 Defendants deny the remaining allegations in Paragraph 5.52.

11 5.53. The contents of any investigation documents referenced in Paragraph 5.53 speak
12 for themselves. Defendants lack sufficient information to either admit or deny the specific
13 statements attributed to any investigation in Paragraph 5.53 and therefore deny the same.

14 5.54. Defendants admit that Michael Nolan was charged with five felonies involving
15 the sexual exploitation of a minor. Defendants deny the remaining allegations in Paragraph 5.54.

16 5.55. The contents of the criminal and civil cases against Nolan speak for themselves.
17 Defendants lack sufficient information to either admit or deny the specific allegations in those
18 cases and therefore deny the same. Defendants deny the remaining allegations in Paragraph
19 5.55.

20 5.56. Defendants admit Katherine Kimbrel, Erin Stiebritz (née Snodgrass), and
21 Samantha Washington were employed at Green Hill. Defendants admit Samantha Washington
22 pleaded guilty to charges of second-degree assault and fourth-degree assault with sexual
23 motivation. Defendants admit Erin Stiebritz (née Snodgrass) pleaded guilty to custodial sexual
24 misconduct in 2016. Defendants deny the remaining allegations in Paragraph 5.56.

25 5.57. Defendants admit that multiple criminal and civil lawsuits have been filed
26 involving claims of child sex abuse and harassment arising out of incidents alleged to have
27 occurred at Green Hill School, Echo Glen Children's Center, Maple Lane School, and Naselle

1 Youth Camp from the 1970s through the 2010s. Defendants deny the remaining allegations in
2 Paragraph 5.57.

3 5.58. The allegations in Paragraph 5.58 of the Complaint contain legal arguments and
4 legal conclusions to which no response is required. Defendants deny the remaining allegations in
5 Paragraph 5.58.

6 5.59. Defendants deny the allegations in Paragraph 5.59.

7 5.60. Defendants deny the allegations in Paragraph 5.60.

8 5.61. Defendants deny the allegations in Paragraph 5.61.

9 5.62. Defendants admit Dr. Isaac Pope was a physician at Green Hill School who has been
10 investigated both criminally and by the Washington Medical Commission. Defendants deny the
11 remaining allegations in Paragraph 5.62.

12 5.63. Defendants deny the allegations in Paragraph 5.63.

13 5.64. Defendants deny the allegations in Paragraph 5.64.

14 5.65. Defendants deny the allegations in Paragraph 5.65.

15 5.66. Defendants deny the allegations in Paragraph 5.66.

16 5.67. Defendants deny the allegations in Paragraph 5.67.

17 5.68. Defendants deny the allegations in Paragraph 5.68.

18 5.69. Defendants deny the allegations in Paragraph 5.69

19 5.70. Defendants deny the allegations in Paragraph 5.70.

20 5.71. Defendants deny the allegations in Paragraph 5.71.

21 5.72. The allegations in Paragraph 5.72 of the Complaint contain legal arguments and
22 legal conclusions to which no response is required. To the extent a response is required,
23 Defendants deny the allegations contained therein.

24 VI. PLAINTIFFS' ALLEGATIONS

25 6.1. The allegations in Paragraph 6.1 of the Complaint contain legal arguments and
26 legal conclusions to which no response is required. To the extent a response is required,
27 Defendants deny the allegations contained therein.

1 6.2. The allegations in Paragraph 6.2 of the Complaint contain legal arguments and
2 legal conclusions to which no response is required. To the extent a response is required,
3 Defendants deny the allegations contained therein.

4 6.3. Defendants deny the allegations in Paragraph 6.3.

5 6.4. Defendants admit Plaintiff A.A. was a minor when he resided at Maple Lane
6 School in 1994-1995. Defendants lack sufficient information to either admit or deny the current
7 residence of Plaintiff A.A. and therefore deny same. Defendants deny the remaining allegations
8 of Paragraph 6.4.

9 6.5. Defendants admit Plaintiff A.A.2 was a minor when he resided at Naselle Youth
10 Camp for a period in 1994-1995. Defendants admit that Plaintiff A.A.2 continued to reside at
11 Naselle Youth Camp for periods in 1995-1997. Defendants lack sufficient information to either
12 admit or deny the current residence of Plaintiff A.A.2 and therefore deny the same. Defendants
13 deny the remaining allegations of Paragraph 6.5.

14 6.6. Defendants admit Plaintiff A.A.3 was a minor when he resided at Green Hill
15 School in 2002-2003. Defendants lack sufficient information to admit or deny the current
16 residence of Plaintiff A.A.3 and therefore deny the same. Defendants deny the remaining
17 allegations of Paragraph 6.6.

18 6.7. Defendants admit Plaintiff A.C. was a minor when he resided at Green Hill
19 School for a period in 2013. Defendants admit Plaintiff A.C. continued to reside at Green Hill
20 School in 2013-2016. Defendants lack sufficient information to admit or deny the current
21 residence of Plaintiff A.C. and therefore deny the same. Defendants deny the remaining
22 allegations of Paragraph 6.7.

23 6.8. Defendants lack sufficient information to admit or deny whether Plaintiff A.E.
24 resided at Green Hill School and therefore deny the same. Defendants lack sufficient
25 information to admit or deny the current residence of Plaintiff A.E. and therefore deny the same.
26 Defendants deny the remaining allegations of Paragraph 6.8.

1 6.9. Defendants lack sufficient information to admit or deny whether Plaintiff A.F.
2 resided in Nellum's Home and therefore deny the allegation. Defendants admit that Plaintiff
3 A.F. was a minor when she resided at Echo Glen Children's Center in 1984-1985. Defendants
4 lack sufficient information to admit or deny the current residence of Plaintiff A.F. and therefore
5 deny the same. Defendants deny the remaining allegations of Paragraph 6.9.

6 6.10. Defendants admit Plaintiff A.H. was a minor when he resided at Maple Lane
7 School in 1997-1998. Defendants lack sufficient information to admit or deny the current
8 residence of Plaintiff A.H. and therefore deny the same. Defendants deny the remaining
9 allegations of Paragraph 6.10.

10 6.11. Defendants admit Plaintiff A.H.2 was a minor when he resided at Naselle Youth
11 Camp in 2001-2002. Defendants admit Plaintiff A.H.2 was a minor when he resided at Maple
12 Lane School for a period in 2002-2003. Defendants admit Plaintiff A.H.2 continued to reside at
13 Maple Lane School for periods in 2003-2005. Defendants lack sufficient information to admit or
14 deny the current residence Plaintiff A.H.2 and therefore deny the same. Defendants deny the
15 remaining allegations of Paragraph 6.11.

16 6.12. Defendants lack sufficient information to admit or deny whether Plaintiff A.H.3
17 resided at Green Hill School and therefore deny the same. Defendants lack sufficient
18 information to admit or deny the current residence of Plaintiff A.H.3 and therefore deny the
19 same. Defendants deny the remaining allegations of Paragraph 6.12.

20 6.13. Defendants lack sufficient information to admit or deny whether Plaintiff A.J.
21 resided at Woodinville Community Facility and therefore deny the same. Defendants lack
22 sufficient information to admit or deny the current residence of Plaintiff A.J. and therefore deny
23 the same. Defendants deny the remaining allegations of Paragraph 6.13.

24 6.14. Defendants lack sufficient information to admit or deny whether Plaintiff A.K.
25 resided at Green Hill School and therefore deny the same. Defendants lack sufficient
26 information to admit or deny the current residence of Plaintiff A.K. and therefore deny the same.
27 Defendants deny the remaining allegations of Paragraph 6.14.

1 6.15. Defendants admit Plaintiff A.L. was a minor when she resided at Echo Glen
2 Children's Center in 1989-1990. Defendants lack sufficient information to admit or deny the
3 current residence of Plaintiff A.L. and therefore deny the same. Defendants deny the remaining
4 allegations of Paragraph 6.15.

5 6.16. Defendants admit Plaintiff A.M. was a minor when he resided at Echo Glen
6 Children's Center in 2003-2004. Defendants admit Plaintiff A.M. was a minor when he resided
7 at Maple Lane School for a period of time in 2006. Defendants admit Plaintiff A.M. continued
8 to reside at Maple Lane School for a period in 2006-2007. Defendants lack sufficient
9 information to admit or deny the current residence of Plaintiff A.M. and therefore deny the same.
10 Defendants deny the remaining allegations of Paragraph 6.16.

11 6.17. Defendants admit Plaintiff A.N. was a minor when he resided at Naselle Youth
12 Camp in 1992-1993. Defendants lack sufficient information to admit or deny the current
13 residence of Plaintiff A.N. and therefore deny the same. Defendants deny the remaining
14 allegations of Paragraph 6.17.

15 6.18. Defendants admit Plaintiff A.P. resided at Naselle Youth Camp in 1994.
16 Defendants admit Plaintiff A.P. resided at Green Hill School for periods in 1994-1996.
17 Defendants admit Plaintiff A.P. resided at Maple Lane School in 1996. Defendants lack
18 sufficient information to admit or deny the current residence of Plaintiff A.P. and therefore deny
19 the same. Defendants deny the remaining allegations of Paragraph 6.18.

20 6.19. Defendants admit Plaintiff A.P.2 was a minor when he resided at Echo Glen
21 Children's Center for periods in 1997-1998. Defendants admit Plaintiff A.P.2 was a minor when
22 he resided at Naselle Youth Camp for a period in 2001-2002. Defendants admit Plaintiff A.P.2
23 continued to reside at Naselle Youth Camp in 2002. Defendants lack sufficient information to
24 admit or deny the current residence of Plaintiff A.P.2 and therefore deny the same. Defendants
25 deny the remaining allegations of Paragraph 6.19.

26 6.20. Defendants admit Plaintiff A.P.3 was a minor when he resided at Maple Lane
27 School for a period in 2006-2007. Defendants admit Plaintiff A.P.3 continued to reside at Maple

1 Lane School for a period of time in 2007. Defendants lack sufficient information to admit or
2 deny the current residence of Plaintiff A.P.3 and therefore deny the same. Defendants deny the
3 remaining allegations of Paragraph 6.20.

4 6.21. Defendants admit Plaintiff A.R. was a minor when he resided at Maple Lane
5 School in 1997-1998. Defendants admit Plaintiff A.R. was a minor when he resided at Green
6 Hill School for a period in 1998-2000. Defendants admit Plaintiff A.R. continued to reside at
7 Green Hill School in 2000-2002. Defendants lack sufficient information to admit or deny the
8 current residence of Plaintiff A.R. and therefore deny the same. Defendants deny the remaining
9 allegations of Paragraph 6.21.

10 6.22. Defendants admit Plaintiff A.S. was a minor when he resided at Green Hill
11 School for a period in 2012-2013. Defendants admit Plaintiff A.S. continued to reside at Green
12 Hill School in 2013-2014. Defendants lack sufficient information to admit or deny the current
13 residence of Plaintiff A.S. and therefore deny the same. Defendants deny the remaining
14 allegations of Paragraph 6.22.

15 6.23. Defendants admit Plaintiff A.S.2 resided at Naselle Youth Camp in 2000.
16 Defendants lack sufficient information to admit the current residence of Plaintiff A.S.2 and
17 therefore deny the same. Defendants deny the remaining allegations of Paragraph 6.23.

18 6.24. Defendants admit Plaintiff A.S.3 was a minor when she resided at Echo Glen
19 Children's Center in 1986. Defendants lack sufficient information to admit or deny the current
20 residence of Plaintiff A.S.3 and therefore deny the same. Defendants deny the remaining
21 allegations of Paragraph 6.24.

22 6.25. Defendants admit Plaintiff A.W. was a minor when she resided at Naselle Youth
23 Camp in 2007. Defendants lack sufficient information to admit or deny the current residence of
24 Plaintiff A.W. and therefore deny the same. Defendants deny the remaining allegations of
25 Paragraph 6.25.

26 6.26. Defendants lack sufficient information to admit or deny whether Plaintiff B.A.
27 resided at Green Hill School and therefore deny the same. Defendants lack sufficient

1 information to admit or deny the current residence of Plaintiff B.A. and therefore deny the same.
2 Defendants deny the remaining allegations of Paragraph 6.26.

3 6.27. Defendants admit Plaintiff B.A.2 was a minor when he resided at Naselle Youth
4 Camp in 1996-1997. Defendants lack sufficient information to admit or deny the current
5 residence of Plaintiff B.A.2 and therefore deny the same. Defendants deny the remaining
6 allegations of Paragraph 6.27.

7 6.28. Defendants admit Plaintiff B.B. was a minor when he resided at Green Hill
8 School for periods in 2006-2007. Defendants admit Plaintiff B.B. was a minor when he resided
9 at Maple Lane School for a period in 2007-2008. Defendants admit Plaintiff B.B. continued to
10 reside at Maple Lane School in 2008-2009. Defendants lack sufficient information to admit or
11 deny the current residence of Plaintiff B.B. and therefore deny the same. Defendants deny the
12 remainder of Paragraph 6.28.

13 6.29. Defendants admit Plaintiff B.E. was a minor when he resided at Maple Lane
14 School in 1993-1995. Defendants lack sufficient information to admit or deny the current
15 residence of Plaintiff B.E. and therefore deny the same. Defendants deny the remaining
16 allegations of Paragraph 6.29.

17 6.30. Defendants admit Plaintiff B.F. was a minor when she resided at Echo Glen
18 Children's Center for periods in 2008. Defendants admit Plaintiff B.F. continued to reside at
19 Echo Glen in 2008. Defendants lack sufficient information to admit or deny the current
20 residence of Plaintiff B.F. and therefore deny the same. Defendants deny the remaining
21 allegations of Paragraph 6.30.

22 6.31. Defendants lack sufficient information to admit or deny whether Plaintiff B.H.
23 resided at Echo Glen Children's Center and therefore deny the same. Defendants lack sufficient
24 information to admit or deny the current residence of Plaintiff B.H. and therefore deny the same.
25 Defendants deny the remaining allegations of Paragraph 6.31.

26 6.32. Defendants admit Plaintiff B.H.2 was a minor when he resided at Naselle Youth
27 Camp for periods in 1984-1985. Defendants lack sufficient information to admit or deny the

1 current residence of Plaintiff B.H.2 and therefore deny the same. Defendants deny the remaining
2 allegations of Paragraph 6.32.

3 6.33. Defendants admit Plaintiff B.K. was a minor when he resided at Green Hill
4 School for a period in 1987. Defendants admit Plaintiff B.K. continued to reside at Green Hill
5 School in 1987-1988. Defendants lack sufficient information to admit or deny the current
6 residence of Plaintiff B.K. and therefore deny the same. Defendants deny the remaining
7 allegations of Paragraph 6.33.

8 6.34. Defendants lack sufficient information to admit or deny whether Plaintiff B.K.2
9 resided at Echo Glen Children's Center and therefore deny the allegation. Defendants lack
10 sufficient information to admit or deny the current residence of Plaintiff B.K.2 and therefore
11 deny the same. Defendants deny the remaining allegations of Paragraph 6.34.

12 6.35. Defendants lack sufficient information to admit or deny whether Plaintiff B.K.3
13 resided at Alpine House Group Home and therefore deny the allegation. Defendants admit
14 Plaintiff B.K.3 was a minor when he resided at Maple Lane School in 2009. Defendants lack
15 sufficient information to admit or deny the current residence of Plaintiff B.K.3 and therefore
16 deny the same. Defendants deny the remaining allegations of Paragraph 6.35.

17 6.36. Defendants admit Plaintiff B.N. was a minor when she resided at Echo Glen
18 Children's Center in 1992. Defendants lack sufficient information to admit or deny the current
19 residence of Plaintiff B.N. and therefore deny the same. Defendants deny the remaining
20 allegations of Paragraph 6.36.

21 6.37. Defendants admit Plaintiff B.R. was a minor when he resided at Maple Lane
22 School for periods in 1993-1994. Defendants lack sufficient information to admit or deny the
23 current residence of Plaintiff B.R. and therefore deny the same. Defendants deny the remaining
24 allegations of Paragraph 6.37.

25 6.38. Defendants admit Plaintiff B.U. was a minor when he resided at Green Hill
26 School for periods in 2016-2018. Defendants admit Plaintiff B.U. continued at Green Hill
27 School in 2018-2020. Defendants lack sufficient information to admit or deny the current

1 residence of Plaintiff B.U. and therefore deny the same. Defendants deny the remaining
2 allegations of Paragraph 6.38.

3 6.39. Defendants admit Plaintiff B.U.2 resided at Green Hill School in 1989.
4 Defendants lack sufficient information to admit or deny the current residence of Plaintiff B.U.2
5 and therefore deny the same. Defendants deny the remaining allegations of Paragraph 6.39.

6 6.40. Defendants admit Plaintiff B.V. was a minor when he resided at Mission Creek
7 Youth Camp for periods in 2000-2001. Defendants lack sufficient information to admit or deny
8 the current residence of Plaintiff B.V. and therefore deny the same. Defendants deny the
9 remaining allegations of Paragraph 6.40.

10 6.41. Defendants admit Plaintiff B.W. was a minor when he resided at Naselle Youth
11 Camp for periods in 1990-1991. Defendants admit Plaintiff B.W. continued to reside at Naselle
12 Youth Camp in 1991. Defendants lack sufficient information to admit or deny the current
13 residence of Plaintiff B.W. and therefore deny the same. Defendants deny the remaining
14 allegations of Paragraph 6.41.

15 6.42. Defendants admit Plaintiff C.A. was a minor when he resided at Echo Glen
16 Children's Center in 2001. Defendants admit Plaintiff C.A. was a minor when he resided at
17 Naselle Youth Camp in 2001-2002. Defendants lack sufficient information to admit or deny the
18 current residence of Plaintiff C.A. and therefore deny the same. Defendants deny the remaining
19 allegations of Paragraph 6.42.

20 6.43. Defendants admit Plaintiff C.B. was a minor when he resided at Naselle Youth
21 Camp in 1998. Defendants lack sufficient information to admit or deny the current residence of
22 Plaintiff C.B. and therefore deny the same. Defendants deny the remaining allegations of
23 Paragraph 6.43.

24 6.44. Defendants admit Plaintiff C.C. was a minor when he resided at Naselle Youth
25 Camp for periods in 1989-1990. Defendants lack sufficient information to admit or deny the
26 current residence of Plaintiff C.C. and therefore deny the same. Defendants deny the remaining
27 allegations of Paragraph 6.44.

1 6.45. Defendants admit Plaintiff C.C.2 was a minor when he resided at Green Hill
2 School for periods in 1990. Defendants lack sufficient information to admit or deny the current
3 residence of Plaintiff C.C.2 and therefore deny the same. Defendants deny the remaining
4 allegations of Paragraph 6.45.

5 6.46. Defendants admit Plaintiff C.C.3 was a minor when he resided at Naselle Youth
6 Camp for periods in 2008 and 2010. Defendants admit Plaintiff C.C.3 continued to reside at
7 Naselle Youth Camp in 2010-2011. Defendants lack sufficient information to admit or deny the
8 current residence of Plaintiff C.C.3 and therefore deny the same. Defendants deny the remaining
9 allegations of Paragraph 6.46.

10 6.47. Defendants admit Plaintiff C.C.4 was a minor when he resided at Green Hill
11 School for periods in 1998. Defendants lack sufficient information to admit or deny the current
12 residence of Plaintiff C.C.4 and therefore deny the same. Defendants deny the remaining
13 allegations of Paragraph 6.47.

14 6.48. Defendants admit Plaintiff C.D. was a minor when he resided at Maple Lane
15 School for periods in 1998-1999. Defendants admit Plaintiff C.D. continued to reside at Maple
16 Lane School in 1999. Defendants lack sufficient information to admit or deny the current
17 residence of Plaintiff C.D. and therefore deny the same. Defendants deny the remaining
18 allegations of Paragraph 6.48.

19 6.49. Defendants admit Plaintiff C.F. was a minor when he resided at Maple Lane
20 School for periods in 1995-1998. Defendants admit Plaintiff C.F. continued to reside at Maple
21 Lane School in 1998. Defendants lack sufficient information to admit or deny the current
22 residence of Plaintiff C.F. and therefore deny the same. Defendants deny the remaining
23 allegations of Paragraph 6.49.

24 6.50. Defendants admit Plaintiff C.G. was a resident of Green Hill School in 1997-
25 1999. Defendants lack sufficient information to admit or deny the current residence of Plaintiff
26 C.G. and therefore deny the same. Defendants deny the remaining allegations of Paragraph 6.50.

1 6.51. Defendants admit Plaintiff C.H. was a minor when he resided at Green Hill
2 School for a period in 2015. Defendants admit Plaintiff C.H. continued to reside at Green Hill
3 School in 2015. Defendants lack sufficient information to admit or deny the current residence of
4 Plaintiff C.H. and therefore deny the same. Defendants deny the remaining allegations of
5 Paragraph 6.51.

6 6.52. Defendants lack sufficient information to admit or deny whether Plaintiff C.H.2
7 resided at Green Hill School and therefore deny the allegation. Defendants lack sufficient
8 information to admit or deny the current residence of Plaintiff C.H.2 and therefore deny the
9 same. Defendants deny the remaining allegations of Paragraph 6.52.

10 6.53. Defendants admit Plaintiff C.J. was a minor when she resided at Echo Glen
11 Children's Center in 2003. Defendants lack sufficient information to admit or deny the current
12 residence of Plaintiff C.J. and therefore deny the same. Defendants deny the remaining
13 allegations of Paragraph 6.53.

14 6.54. Defendants admit Plaintiff C.K. was a minor when he resided at Maple Lane
15 School for a period in 2009. Defendants lack sufficient information to admit or deny the current
16 residence of Plaintiff C.K. and therefore deny the same. Defendants deny the remaining
17 allegations of Paragraph 6.54.

18 6.55. Defendants admit Plaintiff C.L. was a minor when he resided at Naselle Youth
19 Camp for periods in 2009-2010. Defendants admit Plaintiff C.L. continued to reside at Green
20 Hill in 2010. Defendants lack sufficient information to admit or deny the current residence of
21 Plaintiff C.L. and therefore deny the same. Defendants deny the remaining allegations of
22 Paragraph 6.55.

23 6.56. Defendants admit Plaintiff C.L.2 was a minor when he resided at Maple Lane
24 School for periods in 1995-1996 and 1998. Defendants lack sufficient information to admit or
25 deny the current residence of Plaintiff C.L.2 and therefore deny the same. Defendants deny the
26 remaining allegations of Paragraph 6.56.

1 6.57. Defendants admit Plaintiff C.M. was a minor when he resided at Green Hill
2 School for periods in 2013-2014. Defendants admit Plaintiff C.M. continued to reside at Green
3 Hill School for periods in 2014-2017. Defendants lack sufficient information to admit or deny
4 the current residence of Plaintiff C.M. and therefore deny the same. Defendants deny the
5 remaining allegations of Paragraph 6.57.

6 6.58. Defendants admit Plaintiff C.M.2 was a minor when she resided at Echo Glen
7 Children's Center in 1996 and for a period in 1998. Defendants admit Plaintiff C.M.2 continued
8 to reside at Echo Glen Children's Center in 1998. Defendants lack sufficient information to
9 admit or deny the current residence of Plaintiff C.M.2 and therefore deny the same. Defendants
10 deny the remaining allegations of Paragraph 6.58.

11 6.59. Defendants lack sufficient information to admit or deny whether Plaintiff C.M.3
12 resided at Naselle Youth Camp and therefore deny the allegation. Defendants lack sufficient
13 information to admit or deny the current residence of Plaintiff C.M.3 and therefore deny the
14 same. Defendants deny the remaining allegations of Paragraph 6.59.

15 6.60. Defendants lack sufficient information to admit or deny whether Plaintiff C.Q.
16 resided at Echo Glen Children's Center and therefore deny the allegation. Defendants lack
17 sufficient information to admit or deny the current residence of Plaintiff C.Q. and therefore deny
18 the same. Defendants deny the remaining allegations of Paragraph 6.60.

19 6.61. Defendants admit Plaintiff C.R. was a minor when she resided at Naselle Youth
20 Camp for a period in 2002. Defendants lack sufficient information to admit or deny the current
21 residence of Plaintiff C.R. and therefore deny the same. Defendants deny the remaining
22 allegations of Paragraph 6.61.

23 6.62. Defendants lack sufficient information to admit or deny whether Plaintiff C.R.2
24 resided at Naselle Youth Camp and therefore deny the allegation. Defendants lack sufficient
25 information to admit or deny the current residence of Plaintiff C.R.2 and therefore deny the
26 same. Defendants deny the remaining allegations of Paragraph 6.62.

1 6.63. Defendants admit Plaintiff C.S. was a minor when he resided at Echo Glen
2 Children's Center for periods in 2006-2007. Defendants admit Plaintiff C.S. resided at Naselle
3 Youth Camp for periods in 2010-2011. Defendants lack sufficient information to admit or deny
4 the current residence of Plaintiff C.S. and therefore denies the same. Defendants deny the
5 remaining allegations of Paragraph 6.63.

6 6.64. Defendants admit Plaintiff C.T. was a minor when she resided at Naselle Youth
7 Camp for a period in 2003. Defendants lack sufficient information to admit or deny the current
8 residence of Plaintiff C.T. and therefore deny the same. Defendants deny the remaining
9 allegations of Paragraph 6.64.

10 6.65. Defendants admit Plaintiff C.V. was a minor when he resided at Echo Glen
11 Children's Center for periods in 1998-1999. Defendants lack sufficient information to admit or
12 deny the current residence of Plaintiff C.V. and therefore deny the same. Defendants deny the
13 remaining allegations of Paragraph 6.65.

14 6.66. Defendants admit Plaintiff C.W. was a minor when he resided at Green Hill
15 School for periods in 1993-1994. Defendants lack sufficient information to admit or deny the
16 current residence of Plaintiff C.W. and therefore deny the same. Defendants deny the remaining
17 allegations of Paragraph 6.66.

18 6.67. Defendants admit Plaintiff C.Y. was a minor when she resided at Naselle Youth
19 Camp for a period in 2004. Defendants lack sufficient information to admit or deny the current
20 residence of Plaintiff C.Y. and therefore deny the same. Defendants deny the remaining
21 allegations of Paragraph 6.67.

22 6.68. Defendants admit Plaintiff D.B. was a minor when he resided at Echo Glen
23 Children's Center for a period in 1996-1997. Defendants lack sufficient information to admit or
24 deny the current residence of Plaintiff D.B. and therefore deny the same. Defendants deny the
25 remaining allegations of Paragraph 6.68.

26 6.69. Defendants admit Plaintiff D.B.2 was a minor when he resided at Naselle Youth
27 Camp for a period in 2003-2004. Defendants admit Plaintiff D.B.2 continued to reside at Naselle

1 Youth Camp in 2004-2005. Defendants admit Plaintiff D.B.2 resided at Sunrise Community
2 Facility in 2004. Defendants lack sufficient information to admit or deny the current residence
3 of Plaintiff D.B.2. and therefore deny the same. Defendants deny the remaining allegations of
4 Paragraph 6.69.

5 6.70. Defendants admit Plaintiff D.F. was a minor when he resided at Maple Lane
6 School for periods in 1991. Defendants lack sufficient information to admit or deny the current
7 residence of Plaintiff D.F. and therefore deny the same. Defendants deny the remaining
8 allegations of Paragraph 6.70.

9 6.71. Defendants admit Plaintiff D.H. was a minor when he resided at Maple Lane
10 School for periods in 1993-1994. Defendants admit Plaintiff D.H. was a minor when he resided
11 at Green Hill School for a period in 1995. Defendants admit Plaintiff D.H. continued to reside at
12 Green Hill School in 1995-1997. Defendants lack sufficient information to admit or deny the
13 current residence of Plaintiff D.H. and therefore deny the same. Defendants deny the remaining
14 allegations of Paragraph 6.71.

15 6.72. Defendants lack sufficient information to admit or deny whether Plaintiff D.H.2
16 resided at Cascadia Juvenile Reception and Diagnostic Center or Naselle Youth Camp and
17 therefore deny the allegations. Defendants lack sufficient information to admit or deny the
18 current residence of Plaintiff D.H.2. and therefore deny the same. Defendants deny the
19 remaining allegations of Paragraph 6.72.

20 6.73. Defendants admit Plaintiff D.H.3 was a minor when he resided at Naselle Youth
21 Camp for periods in 1996. Defendants lack sufficient information to admit or deny the current
22 residence of Plaintiff D.H.3. and therefore deny the same. Defendants deny the remaining
23 allegations of Paragraph 6.73.

24 6.74. Defendants admit Plaintiff D.J. was a minor when he resided at Maple Lane
25 School for periods in 1991-1993. Defendants lack sufficient information to admit or deny the
26 current residence of Plaintiff D.J. and therefore deny the same. Defendants deny the remaining
27 allegations of Paragraph 6.74.

1 6.75. Defendants admit Plaintiff D.K. resided at Naselle Youth Camp for periods in
2 2020-2021. Defendants lack sufficient information to admit or deny the current residence of
3 Plaintiff D.K. and therefore deny the same. Defendants deny the remaining allegations of
4 Paragraph 6.75.

5 6.76. Defendants lack sufficient information to admit or deny whether Plaintiff D.L.
6 resided at South Kitsap Group Home, Mission Creek Youth Camp, or Green Hill School and
7 therefore deny the allegations. Defendants lack sufficient information to admit or deny the
8 current residence of Plaintiff D.L. and therefore deny the same. Defendants deny the remaining
9 allegations of Paragraph 6.76.

10 6.77. Defendants admit Plaintiff D.M. was a minor when he resided at Naselle Youth
11 Camp for periods in 1987-1988. Defendants lack sufficient information to admit or deny the
12 current residence of Plaintiff D.M. and therefore deny the same. Defendants deny the remaining
13 allegations of Paragraph 6.77.

14 6.78. Defendants admit Plaintiff D.P. was a minor when she resided at Green Hill
15 School for periods in 2010-2012. Defendants lack sufficient information to admit or deny the
16 current residence of Plaintiff D.P. and therefore deny the same. Defendants deny the remaining
17 allegations of Paragraph 6.78.

18 6.79. Defendants admit Plaintiff D.R. was a minor when he resided at Green Hill
19 School for periods in 2016-2017. Defendants lack sufficient information to admit or deny the
20 current residence of Plaintiff D.R. and therefore deny the same. Defendants deny the remaining
21 allegations of Paragraph 6.79.

22 6.80. Defendants admit Plaintiff D.S. was a minor when he resided at Indian Ridge
23 Youth Camp for a period in 1997. Defendants admit Plaintiff D.S. continued to reside at Indian
24 Ridge Youth Camp in 1997. Defendants admit Plaintiff D.S. resided at Park Creek Community
25 Facility and Canyon View Community Facility in 1997. Defendants lack sufficient information
26 to admit or deny the current residence of Plaintiff D.S. and therefore deny the same. Defendants
27 deny the remaining allegations of Paragraph 6.80.

1 6.81. Defendants admit Plaintiff D.S.2 was a minor when he resided at Naselle Youth
2 Camp for a period in 1988. Defendants lack sufficient information to admit or deny the current
3 residence of Plaintiff D.S.2 and therefore deny the same. Defendants deny the remaining
4 allegations of Paragraph 6.81.

5 6.82. Defendants admit Plaintiff D.S.3 was a minor when he resided at Naselle Youth
6 Camp for a period in 2013. Defendants lack sufficient information to admit or deny the current
7 residence of Plaintiff D.S.3 and therefore deny the same. Defendants deny the remaining
8 allegations of Paragraph 6.82.

9 6.83. Defendants admit Plaintiff D.S.4 was a minor when he resided at Naselle Youth
10 Camp for periods in 1989-1990. Defendants lack sufficient information to admit or deny the
11 current residence of Plaintiff D.S.4 and therefore deny the same. Defendants deny the remaining
12 allegations of Paragraph 6.83.

13 6.84. Defendants admit Plaintiff E.B. was as minor when he resided at Echo Glen
14 Children's Center for periods in 2011-2012. Defendants admit Plaintiff E.B. was a minor when
15 he resided at Green Hill School for periods in 2013-2014. Defendants lack sufficient
16 information to admit or deny the current residence of Plaintiff E.B. and therefore deny the same.
17 Defendants deny the remaining allegations of Paragraph 6.84.

18 6.85. Defendants lack sufficient information to admit or deny whether Plaintiff E.B.2
19 resided at Cushman House, Echo Glen Children's Center, or Parke Creek Community Facility
20 and therefore deny the allegations. Defendants lack sufficient information to admit or deny the
21 current residence of Plaintiff E.B.2 and therefore deny the same. Defendants deny the remaining
22 allegations of Paragraph 6.85.

23 6.86. Defendants admit Plaintiff E.C. was a minor when she resided at Echo Glen
24 Children's Center for periods in 2013-2015. Defendants admit Plaintiff E.C. continued to reside
25 at Echo Glen Children's Center in 2015. Defendants lack sufficient information to admit or deny
26 the current residence of Plaintiff E.C. and therefore deny the same. Defendants deny the
27 remaining allegations of Paragraph 6.86.

1 6.87. Defendants lack sufficient information to admit or deny whether Plaintiff E.H.
2 resided at Naselle Youth Camp and therefore deny the allegation. Defendants lack sufficient
3 information to admit or deny the current residence of Plaintiff E.H. and therefore deny the same.
4 Defendants deny the remaining allegations of Paragraph 6.87.

5 6.88. Defendants admit Plaintiff E.S. was a minor when he resided at Echo Glen
6 Children's Center for periods in 1995-1996. Defendants admit Plaintiff E.S. was a minor when
7 he resided at Naselle Youth Camp for periods in 1996-1999. Defendants admit Plaintiff E.S.
8 continued to reside at Naselle Youth Camp in 1999. Defendants lack sufficient information to
9 admit or deny the current residence of Plaintiff E.S. and therefore deny the same. Defendants
10 deny the remaining allegations of Paragraph 6.88.

11 6.89. Defendants admit Plaintiff E.S.2 was a minor when he resided at Green Hill
12 School for periods in 1999-2000. Defendants lack sufficient information to admit or deny the
13 current residence of Plaintiff E.S.2 and therefore deny the same. Defendants deny the remaining
14 allegations of Paragraph 6.89.

15 6.90. Defendants lack sufficient information to admit or deny whether Plaintiff E.W.
16 resided at Naselle Youth Camp and therefore deny the allegation. Defendants lack sufficient
17 information to admit or deny the current residence of Plaintiff E.W. and therefore deny the same.
18 Defendants deny the remaining allegations of Paragraph 6.90.

19 6.91. Defendants admit Plaintiff E.W.2 was a minor when he resided at Naselle Youth
20 Camp for periods in 2003-2004. Defendants admit Plaintiff E.W.2 continued to reside at Naselle
21 Youth Camp in 2004. Defendants lack sufficient information to admit or deny the current
22 residence of Plaintiff E.W.2 and therefore deny the same. Defendants deny the remaining
23 allegations of Paragraph 6.91.

24 6.92. Defendants admit Plaintiff F.A. was a minor when she resided at Echo Glen
25 Children's Center for periods in 2010-2011. Defendants lack sufficient information to admit or
26 deny the current residence of Plaintiff F.A. and therefore deny the same. Defendants deny the
27 remaining allegations of Paragraph 6.92.

1 6.93. Defendants lack sufficient information to admit or deny whether Plaintiff F.A.2
2 resided at Green Hill School and therefore deny the allegation. Defendants lack sufficient
3 information to admit or deny the current residence of Plaintiff F.A.2 and therefore deny the
4 same. Defendants deny the remaining allegations of Paragraph 6.93.

5 6.94. Defendants lack sufficient information to admit or deny whether Plaintiff F.P.
6 resided at Echo Glen Children's Center and therefore deny the allegation. Defendants lack
7 sufficient information to admit or deny the current residence of Plaintiff F.P. and therefore deny
8 the same. Defendants deny the remaining allegations of Paragraph 6.94.

9 6.95. Defendants lack sufficient information to admit or deny whether Plaintiff F.S.
10 resided at Naselle Youth Camp and therefore deny the allegation. Defendants lack sufficient
11 information to admit or deny the current residence of Plaintiff F.S. and therefore deny the same.
12 Defendants deny the remaining allegations of Paragraph 6.95.

13 6.96. Defendants admit Plaintiff G.B. was a minor when he resided at Naselle Youth
14 Camp for periods in 1999-2000. Defendants admit Plaintiff G.B. was a minor when he resided at
15 Maple Lane School for periods in 2000-2003. Defendants admit Plaintiff G.B. continued to
16 reside at Maple Lane School in 2003-2004. Defendants lack sufficient information to admit or
17 deny the current residence of Plaintiff G.B. and therefore deny the same. Defendants deny the
18 remaining allegations of Paragraph 6.96.

19 6.97. Defendants admit Plaintiff G.F. was a minor when he resided at Maple Lane
20 School in 2011. Defendants admit Plaintiff G.F. was a minor when he resided at Green Hill
21 School for periods in 2011-2012. Defendants lack sufficient information to admit or deny the
22 current residence of Plaintiff G.F. and therefore deny the same. Defendants deny the remaining
23 allegations of Paragraph 6.97.

24 6.98. Defendants admit Plaintiff G.R. was a minor when he resided at Naselle Youth
25 Camp for periods in 2015-2016 and 2017. Defendants lack sufficient information to admit or
26 deny the current residence of Plaintiff G.R. and therefore deny the same. Defendants deny the
27 remaining allegations of Paragraph 6.98.

1 6.99. Defendants admit Plaintiff G.W. was a minor when he resided at Maple Lane
2 School for periods in 1994-1995. Defendants lack sufficient information to admit or deny the
3 current residence of Plaintiff G.W. and therefore deny the same. Defendants deny the remaining
4 allegations of Paragraph 6.99.

5 6.100. Defendants lack sufficient information to admit or deny whether Plaintiff H.B.
6 resided at Echo Glen Children's Center and therefore deny the allegation. Defendants lack
7 sufficient information to admit or deny the current residence of Plaintiff H.B. and therefore deny
8 the same. Defendants deny the remaining allegations of Paragraph 6.100.

9 6.101. Defendants admit Plaintiff H.D. was a minor when she resided at Echo Glen
10 Children's Center for periods in 1993-1995. Defendants lack sufficient information to admit or
11 deny the current residence of Plaintiff H.D. and therefore deny the same. Defendants deny the
12 remaining allegations of Paragraph 6.101.

13 6.102. Defendants admit Plaintiff H.G. was a minor when he resided at Echo Glen
14 Children's Center for periods in 1992-1995. Defendants admit Plaintiff H.G. was a minor when
15 he resided at Jessie Dyslin Boys Ranch for periods in 1995 and 1996. Defendants lack sufficient
16 information to admit or deny the current residence of Plaintiff H.G. and therefore deny the same.
17 Defendants deny the remaining allegations of Paragraph 6.102.

18 6.103. Defendants admit Plaintiff H.H. was a minor when he resided at Green Hill
19 School for periods in 2002-2003. Defendants admit Plaintiff H.H. continued to reside at Green
20 Hill Schol in 2003. Defendants lack sufficient information to admit or deny the current residence
21 of Plaintiff H.H. and therefore deny the same. Defendants deny the remaining allegations of
22 Paragraph 6.103.

23 6.104. Defendants admit Plaintiff H.Y. was a minor when he resided at Naselle Youth
24 Camp for a period in 2012. Defendants admit Plaintiff H.Y. continued to reside at Naselle Youth
25 Camp in 2013. Defendants lack sufficient information to admit or deny the current residence of
26 Plaintiff H.Y. and therefore deny the same. Defendants deny the remaining allegations of
27 Paragraph 6.104.

1 6.105. Defendants admit Plaintiff I.A. was a minor when he resided at Echo Glen
2 Children's Center for periods in 1994-1997. Defendants lack sufficient information to admit or
3 deny the current residence of Plaintiff I.A. and therefore deny the same. Defendants deny the
4 remaining allegations of Paragraph 6.105.

5 6.106. Defendants admit Plaintiff I.B. was a minor when he resided at Green Hill School
6 in 2007-2009. Defendants lack sufficient information to admit or deny the current residence of
7 Plaintiff I.B. and therefore deny the same. Defendants deny the remaining allegations of
8 Paragraph 6.106.

9 6.107. Defendants admit Plaintiff I.M. was a minor when she resided at Echo Glen
10 Children's Center in 2001-2002. Defendants lack sufficient information to admit or deny the
11 current residence of Plaintiff I.M. and therefore deny the same. Defendants deny the remaining
12 allegations of Paragraph 6.107.

13 6.108. Defendants lack sufficient information to admit or deny whether Plaintiff J.B.
14 resided at Echo Glen Children's Center and therefore deny the allegation. Defendants lack
15 sufficient information to admit or deny the current residence of Plaintiff J.B. and therefore deny
16 the same. Defendants deny the remaining allegations of Paragraph 6.108.

17 6.109. Defendants lack sufficient information to admit or deny whether Plaintiff J.B.2
18 resided at Echo Glen Children's Center and Green Hill School and therefore deny the
19 allegations. Defendants lack sufficient information to admit or deny the current residence of
20 Plaintiff J.B.2 and therefore deny the same. Defendants deny the remaining allegations of
21 Paragraph 6.109.

22 6.110. Defendants admit Plaintiff J.B.3 was a minor when he resided at Green Hill
23 School in 1997-1998. Defendants lack sufficient information to admit or deny the current
24 residence of Plaintiff J.B.3 and therefore deny the same. Defendants deny the remaining
25 allegations of Paragraph 6.110.

26 6.111. Defendants lack sufficient information to admit or deny whether Plaintiff J.B.4
27 resided at Maple Lane School and therefore deny the allegation. Defendants lack sufficient

1 information to admit or deny the current residence of Plaintiff J.B.4 and therefore deny the same.
2 Defendants deny the remaining allegations of Paragraph 6.111.

3 6.112. Defendants admit Plaintiff J.C. was a minor when he resided at Naselle Youth
4 Camp for periods in 1989-1990 and 1992. Defendants lack sufficient information to admit or
5 deny the current residence of Plaintiff J.C. and therefore deny the same. Defendants deny the
6 remaining allegations of Paragraph 6.112.

7 6.113. Defendants admit Plaintiff J.C.2 was a minor when he resided at Naselle Youth
8 Camp for a period in 1995. Defendants lack sufficient information to admit or deny the current
9 residence of Plaintiff J.C.2 and therefore deny the same. Defendants deny the remaining
10 allegations of Paragraph 6.113.

11 6.114. Defendants admit Plaintiff J.D. was a minor when he resided at Echo Glen
12 Children's Center for a period in 1985. Defendants lack sufficient information to admit or deny
13 the current residence of Plaintiff J.D. and therefore deny the same. Defendants deny the
14 remaining allegations of Paragraph 6.114.

15 6.115. Defendants admit Plaintiff J.D.2 was a minor when he resided at Maple Lane
16 School for periods in 1990-1991. Defendants lack sufficient information to admit or deny the
17 current residence of Plaintiff J.D.2 and therefore deny the same. Defendants deny the remaining
18 allegations of Paragraph 6.115.

19 6.116. Defendants admit Plaintiff J.D.3 was a minor when he resided at Green Hill
20 School for periods in 2000 and 2001. Defendants admit Plaintiff J.D.3 continued to reside at
21 Green Hill School for a period in 2003. Defendants lack sufficient information to admit or deny
22 the current residence of Plaintiff J.D.3 and therefore deny the same. Defendants deny the
23 remaining allegations of Paragraph 6.116.

24 6.117. Defendants admit Plaintiff J.D.4 was a minor when he resided at Maple Lane
25 School for a period in 1994. Defendants lack sufficient information to admit or deny the current
26 residence of Plaintiff J.D.4 and therefore deny the same. Defendants deny the remaining
27 allegations of Paragraph 6.117.

1 6.118. Defendants admit Plaintiff J.F. was a minor when he resided at Maple Lane
2 School for periods in 1999-2001. Defendants lack sufficient information to admit or deny the
3 current residence of Plaintiff J.F. and therefore deny the same. Defendants deny the remaining
4 allegations of Paragraph 6.118.

5 6.119. Defendants admit Plaintiff J.F.2 was a minor when he resided at Naselle Youth
6 Camp for a period in 1993. Defendants admit Plaintiff J.F.2 continued to reside at Naselle Youth
7 Camp in 1993. Defendants lack sufficient information to admit or deny the current residence of
8 Plaintiff J.F. and therefore deny the same. Defendants deny the remaining allegations of
9 Paragraph 6.119.

10 6.120. Defendants admit Plaintiff J.F.3 was a minor when he resided at Ridgeview
11 Community Facility for periods in 2002. Defendants lack sufficient information to admit or
12 deny the current residence of Plaintiff J.F.3 and therefore deny the same. Defendants deny the
13 remaining allegations of Paragraph 6.120.

14 6.121. Defendants lack sufficient information to admit or deny whether Plaintiff J.F.4
15 was a resident of Green Hill School and therefore deny the allegation. Defendants lack sufficient
16 information to admit or deny the current residence of Plaintiff J.F.4 and therefore deny the same.
17 Defendants deny the remaining allegations of Paragraph 6.121.

18 6.122. Defendants lack sufficient information to admit or deny whether Plaintiff J.G. was
19 a resident of Spruce Street Inn and therefore deny the allegation. Defendants lack sufficient
20 information to admit or deny the current residence of Plaintiff J.G. and therefore deny the same.
21 Defendants deny the remaining allegations of Paragraph 6.122.

22 6.123. Defendants admit Plaintiff J.G.2 was a minor when he resided at Naselle Youth
23 Camp for periods in 1986-1987. Defendants lack sufficient information to admit or deny the
24 current residence of Plaintiff J.G.2 and therefore deny the same. Defendants deny the remaining
25 allegations of Paragraph 6.123.

26 6.124. Defendants admit Plaintiff J.G.3 was a minor when he resided at Green Hill
27 School for a period in 2005. Defendants lack sufficient information to admit or deny the current

1 residence of Plaintiff J.G.3 and therefore deny the same. Defendants deny the remaining
2 allegations of Paragraph 6.124.

3 6.125. Defendants admit Plaintiff J.G.4 was a minor when he resided at Green Hill
4 School for a period in 2001. Defendants lack sufficient information to admit or deny the current
5 residence of Plaintiff J.G.4 and therefore deny the same. Defendants deny the remaining
6 allegations of Paragraph 6.125.

7 6.126. Defendants lack sufficient information to admit or deny whether Plaintiff J.H.
8 resided at Echo Glen Children's Center and therefore deny the allegation. Defendants lack
9 sufficient information to admit or deny the current residence of Plaintiff J.H. and therefore deny
10 the same. Defendants deny the remaining allegations of Paragraph 6.126.

11 6.127. Defendants admit Plaintiff J.H.2 was a minor when he resided at Green Hill
12 School for periods in 1995-1996. Defendants lack sufficient information to admit or deny the
13 current residence of Plaintiff J.H.2 and therefore deny the same. Defendants deny the remaining
14 allegations of Paragraph 6.127.

15 6.128. Defendants lack sufficient information to admit or deny whether Plaintiff J.H.3
16 resided at Echo Glen Children's Center and therefore deny the allegation. Defendants lack
17 sufficient information to admit or deny the current residence of J.H.3 and therefore deny the
18 same. Defendants deny the remaining allegations of Paragraph 6.128.

19 6.129. Defendants admit Plaintiff J.H.4 was a minor when he resided at Echo Glen
20 Children's Center for periods in 1996-1997. Defendants admit Plaintiff J.H.4 was a minor when
21 he resided at Green Hill for periods in 1998-1999. Defendants lack sufficient information to
22 admit or deny the current residence of J.H.4 and therefore deny the same. Defendants deny the
23 remaining allegations of Paragraph 6.129.

24 6.130. Defendants admit Plaintiff J.I. was a minor when he resided at Green Hill School
25 for a period in 2012. Defendants admit Plaintiff J.I. resided at Green Hill School in 2013-2014.
26 Defendants lack sufficient information to admit or deny the current residence of Plaintiff J.I. and
27 therefore deny the same. Defendants deny the remaining allegations of Paragraph 6.130.

1 6.131. Defendants admit Plaintiff J.K. was a minor when he resided at Green Hill School
2 for a period in 2014. Defendants admit Plaintiff J.K. was a minor when he resided at Touchstone
3 Community Facility for a period in 2014. Defendants lack sufficient information to admit or
4 deny the current residence of Plaintiff J.K. and therefore deny the same. Defendants deny the
5 remaining allegations of Paragraph 6.131.

6 6.132. Defendants admit Plaintiff J.K.2 was a minor when he resided at Green Hill
7 School for a period of time in 1992. Defendants admit Plaintiff J.K.2 continued to reside at
8 Green Hill School in 1992. Defendants lack sufficient information to admit or deny the current
9 residence of Plaintiff J.K.2 and therefore deny the same. Defendants deny the remaining
10 allegations of Paragraph 6.132.

11 6.133. Defendants admit Plaintiff J.L. was a minor when he resided at Echo Glen
12 Children's Center for periods in 1994-1995. Defendants lack sufficient information to admit or
13 deny the current residence of Plaintiff J.L. and therefore deny the same. Defendants deny the
14 remaining allegations of Paragraph 6.132.

15 6.134. Defendants admit Plaintiff J.L.2 was a minor when she resided at Echo Glen
16 Children's Center for periods in 2002 and 2005-2006. Defendants admit Plaintiff J.L.2
17 continued to reside at Echo Glen Children's Center in 2006. Defendants lack sufficient
18 information to admit or deny the current residence of Plaintiff J.L.2 and therefore deny the same.
19 Defendants deny the remaining allegations of Paragraph 6.134.

20 6.135. Defendants admit Plaintiff J.L.3 was a minor when he resided at Naselle Youth
21 Camp for a period in 1999. Defendants lack sufficient information to admit or deny the current
22 residence of Plaintiff J.L.3 and therefore deny the same. Defendants deny the remaining
23 allegations of Paragraph 6.135.

24 6.136. Defendants admit Plaintiff J.M. was a minor when he resided at Naselle Youth
25 Camp for periods in 2003-2005. Defendants lack sufficient information to admit or deny the
26 current residence of Plaintiff J.M. and therefore deny the same. Defendants deny the remaining
27 allegations of Paragraph 6.136.

1 6.137. Defendants admit Plaintiff J.M.2 was a minor when he resided at Green Hill
2 School for periods in 2010-2011. Defendants admit Plaintiff J.M.2 continued to reside at Green
3 Hill School in 2011. Defendants lack sufficient information to admit or deny the current
4 residence of Plaintiff J.M.2 and therefore deny the same. Defendants deny the remaining
5 allegations of Paragraph 6.137.

6 6.138. Defendants admit Plaintiff J.M.3 was a minor when he resided at Green Hill
7 School for periods in 1996-1997. Defendants lack sufficient information to admit or deny the
8 current residence of Plaintiff J.M.3 and therefore deny the same. Defendants deny the remaining
9 allegations of Paragraph 6.138.

10 6.139. Defendants admit Plaintiff J.M.4 was a minor when he resided at Echo Glen
11 Children's Center for periods in 1997-1999. Defendants lack sufficient information to admit or
12 deny the current residence of Plaintiff J.M.4 and therefore deny the same. Defendants deny the
13 remaining allegations of Paragraph 6.139.

14 6.140. Defendants lack sufficient information to admit or deny whether Plaintiff J.N.
15 resided at Mission Creek Youth Camp and therefore deny the allegation. Defendants lack
16 sufficient information to admit or deny the current residence of Plaintiff J.N. and therefore deny
17 the same. Defendants deny the remaining allegations of Paragraph 6.140.

18 6.141. Defendants admit Plaintiff J.O. was a minor when he resided at Naselle Youth
19 Camp for a period in 2018. Defendants admit Plaintiff J.O. continued to reside at Naselle Youth
20 Camp for periods in 2019-2020. Defendants lack sufficient information to admit or deny the
21 current residence of Plaintiff J.O. and therefore deny the same. Defendants deny the remaining
22 allegations of Paragraph 6.141.

23 6.142. Defendants admit Plaintiff J.O.2 was a minor when he resided at Maple Lane
24 School for periods in 1987-1988. Defendants admit Plaintiff J.O.2 continued to reside at Maple
25 Lane School in 1988. Defendants admit Plaintiff J.O.2 resided at Echo Glen Children's Center
26 in 1989-1990. Defendants lack sufficient information to admit or deny the current residence of
27

1 Plaintiff J.O.2 and therefore deny the same. Defendants deny the remaining allegations of
2 Paragraph 6.142.

3 6.143. Defendants admit Plaintiff J.P. was a minor when he resided at Echo Glen
4 Children's Center for periods in 1993-1994. Defendants lack sufficient information to admit or
5 deny the current residence of Plaintiff J.P. and therefore deny the same. Defendants deny the
6 remaining allegations of Paragraph 6.143.

7 6.144. Defendants lack sufficient information to admit or deny whether Plaintiff J.P.2
8 resided at Green Hill School and therefore deny the allegation. Defendants lack sufficient
9 information to admit or deny the current residence of Plaintiff J.P.2 and therefore deny the same.
10 Defendants deny the remaining allegations of Paragraph 6.144.

11 6.145. Defendants admit Plaintiff J.P.3 was a minor when he resided at Naselle Youth
12 Camp for periods in 1995 and 1996. Defendants lack sufficient information to admit or deny the
13 current residence of Plaintiff J.P.3 and therefore deny the same. Defendants deny the remaining
14 allegations of Paragraph 6.145.

15 6.146. Defendants admit Plaintiff J.P.4 was a minor when he resided at Echo Glen
16 Children's Center for a period in 1991. Defendants admit Plaintiff J.P.4 was a minor when he
17 resided at Naselle Youth Camp in 1992-1994. Defendants lack sufficient information to admit or
18 deny the current residence of Plaintiff J.P.4 and therefore deny the same. Defendants deny the
19 remaining allegations of Paragraph 6.146.

20 6.147. Defendants admit Plaintiff J.Q. resided at Green Hill School for a period in 1999.
21 Defendants lack sufficient information to admit or deny the current residence of Plaintiff J.Q.
22 and therefore deny the same. Defendants deny the remaining allegations of Paragraph 6.147.

23 6.148. Defendants admit Plaintiff J.S. was a minor when he resided at Maple Lane
24 School for a period in 2006. Defendants lack sufficient information to admit or deny the current
25 residence of Plaintiff J.S. and therefore deny the same. Defendants deny the remaining
26 allegations of Paragraph 6.148.

1 6.149. Defendants admit Plaintiff J.S.2 was a minor when he resided at Maple Lane
2 School in 1994-1995. Defendants admit Plaintiff J.S.2 was a minor when he resided at Green
3 Hill School for a period in 1996. Defendants admit Plaintiff J.S.2 continued to reside at Green
4 Hill School in 1996-1997. Defendants lack sufficient information to admit or deny the current
5 residence of Plaintiff J.S.2 and therefore deny the same. Defendants deny the remaining
6 allegations of Paragraph 6.149.

7 6.150. Defendants admit Plaintiff J.S.3 was a minor when he resided at Maple Lane
8 School for periods in 1993. Defendants lack sufficient information to admit or deny the current
9 residence of Plaintiff J.S.3 and therefore deny the same. Defendants deny the remaining
10 allegations of Paragraph 6.150.

11 6.151. Defendants admit Plaintiff J.S.4 was a minor when he resided at Maple Lane
12 School for a period in 1998. Defendants lack sufficient information to admit or deny the current
13 residence of Plaintiff J.S.4 and therefore deny the same. Defendants deny the remaining
14 allegations of Paragraph 6.151.

15 6.152. Defendants lack sufficient information to admit or deny whether Plaintiff J.S.5
16 resided at Maple Lane School and therefore deny the allegation. Defendants lack sufficient
17 information to admit or deny the current residence of Plaintiff J.S.5 and therefore deny the same.
18 Defendants deny the remaining allegations of Paragraph 6.152.

19 6.153. Defendants admit Plaintiff J.S.6 was a minor when she resided at Naselle Youth
20 Camp for periods in 2002. Defendants lack sufficient information to admit or deny the current
21 residence of Plaintiff J.S.6 and therefore deny the same. Defendants deny the remaining
22 allegations of Paragraph 6.153.

23 6.154. Defendants lack sufficient information to admit or deny whether Plaintiff J.S.7
24 was a resident of Echo Glen Children's Center or a group home in Elma and therefore deny the
25 allegations. Defendants lack sufficient information to admit or deny the current residence of
26 Plaintiff J.S.7 and therefore deny the same. Defendants deny the remaining allegations of
27 Paragraph 6.154.

1 6.155. Defendants admit Plaintiff J.S.8 was a minor when he resided at Green Hill
2 School for a period in 2019. Defendants lack sufficient information to admit or deny the current
3 residence of Plaintiff J.S.8 and therefore deny the same. Defendants deny the remaining
4 allegations of Paragraph 6.155.

5 6.156. Defendants admit Plaintiff J.S.9 was a minor when he resided at Twin Rivers
6 Community Facility for periods in 2006-2007. Defendants lack sufficient information to admit
7 or deny the current residence of Plaintiff J.S.9 and therefore deny the same. Defendants deny the
8 remaining allegations of Paragraph 6.156.

9 6.157. Defendants lack sufficient information to admit or deny whether Plaintiff J.S.10
10 resided at Spruce Street Inn and therefore deny the allegation. Defendants lack sufficient
11 information to admit or deny the current residence of Plaintiff J.S.10 and therefore deny the
12 same. Defendants deny the remaining allegations of Paragraph 6.157.

13 6.158. Defendants admit Plaintiff J.T. was a minor when he resided at Echo Glen
14 Children's Center for periods in 2006-2007. Defendants lack sufficient information to admit or
15 deny the current residence of Plaintiff J.T. and therefore deny the same. Defendants deny the
16 remaining allegations of Paragraph 6.158.

17 6.159. Defendants lack sufficient information to admit or deny whether Plaintiff J.T.2
18 resided at Green Hill School and therefore deny the allegation. Defendants lack sufficient
19 information to admit or deny the current residence of Plaintiff J.T.2 and therefore deny the same.
20 Defendants deny the remaining allegations of Paragraph 6.159.

21 6.160. Defendants admit Plaintiff J.W. was a minor when he resided at Echo Glen
22 Children's Center for a period in 1996. Defendants lack sufficient information to admit or deny
23 whether Plaintiff J.W. resided at Spruce Street Inn and therefore deny the allegation. Defendants
24 lack sufficient information to admit or deny the current residence of Plaintiff J.W. and therefore
25 deny the same. Defendants deny the remaining allegations of Paragraph 6.160.

26 6.161. Defendants admit Plaintiff J.W.2 was a minor when he resided at Green Hill
27 School for periods in 1998-1999. Defendants lack sufficient information to admit or deny the

1 current residence of Plaintiff J.W.2 and therefore deny the same. Defendants deny the remaining
2 allegations of Paragraph 6.161.

3 6.162. Defendants lack sufficient information to admit or deny whether Plaintiff J.W.3
4 resided at Echo Glen Children's Center and therefore deny the allegation. Defendants lack
5 sufficient information to admit or deny the current residence of Plaintiff J.W.3 and therefore
6 deny the same. Defendants deny the remaining allegations of Paragraph 6.162.

7 6.163. Defendants admit Plaintiff J.W.4 was a minor when he resided at Naselle Youth
8 Camp for a period in 1988. Defendants admit Plaintiff J.W.4 was a minor when he resided at
9 Green Hill School for periods in 1989-1991. Defendants admit Plaintiff J.W.4 continued to
10 reside at Green Hill School in 1991-1993. Defendants lack sufficient information to admit or
11 deny the current residence of Plaintiff J.W.4 and therefore deny the same. Defendants deny the
12 remaining allegations of Paragraph 6.163.

13 6.164. Defendants admit Plaintiff K.A. was a minor when she resided at Naselle Youth
14 Camp for a period in 2006. Defendants lack sufficient information to admit or deny the current
15 residence of Plaintiff K.A. and therefore deny the same. Defendants deny the remaining
16 allegations of Paragraph 6.164.

17 6.165. Defendants admit Plaintiff K.F. was a minor when he resided at Echo Glen
18 Children's Center for a period in 1990. Defendants lack sufficient information to admit or deny
19 the current residence of Plaintiff K.F. and therefore deny the same. Defendants deny the
20 remaining allegations of Paragraph 6.165.

21 6.166. Defendants admit Plaintiff K.H. was a minor when he resided at Green Hill
22 School for a period in 2002. Defendants admit Plaintiff K.H. continued to reside at Green Hill
23 School in 2002. Defendants lack sufficient information to admit or deny the current residence of
24 Plaintiff K.H. and therefore deny the same. Defendants deny the remaining allegations of
25 Paragraph 6.166.

26 6.167. Defendants admit Plaintiff K.M. was a minor when she resided at Naselle Youth
27 Camp for a period in 2001. Defendants lack sufficient information to admit or deny the current

1 residence of Plaintiff K.M. and therefore deny the same. Defendants deny the remaining
2 allegations of Paragraph 6.167.

3 6.168. Defendants lack sufficient information to admit or deny whether Plaintiff K.M.2
4 was placed in foster care and therefore deny the allegation. Defendants lack sufficient
5 information to admit or deny the current residence of Plaintiff K.M.2 and therefore deny the
6 same. Defendants deny the remaining allegations of Paragraph 6.168.

7 6.169. Defendants admit Plaintiff K.P. was a minor when she resided at Naselle Youth
8 Camp for a period in 1994. Defendants lack sufficient information to admit or deny the current
9 residence of Plaintiff K.P. and therefore deny the same. Defendants deny the remaining
10 allegations of Paragraph 6.169.

11 6.170. Defendants lack sufficient information to admit or deny whether Plaintiff K.P.2
12 resided at Echo Glen Children's Center and therefore deny the allegation. Defendants lack
13 sufficient information to admit or deny the current residence of Plaintiff K.P.2 and therefore
14 deny the same. Defendants deny the remaining allegations of Paragraph 6.170.

15 6.171. Defendants admit Plaintiff K.P.3 was a minor when he resided at Echo Glen
16 Children's Center for periods in 2016-2018. Defendants lack sufficient information to admit or
17 deny the current residence of Plaintiff K.P.3 and therefore deny the same. Defendants deny the
18 remaining allegations of Paragraph 6.171.

19 6.172. Defendants admit Plaintiff K.S. was a minor when she resided at Echo Glen
20 Children's Center for periods in 2005-2007. Defendants lack sufficient information to admit or
21 deny the current residence of Plaintiff K.S. and therefore deny the same. Defendants deny the
22 remaining allegations of Paragraph 6.172.

23 6.173. Defendants lack sufficient information to admit or deny whether Plaintiff K.S.2
24 resided at Green Hill School and therefore deny the allegation. Defendants lack sufficient
25 information to admit or deny the current residence of Plaintiff K.S.2 and therefore deny the
26 same. Defendants deny the remaining allegations of Paragraph 6.173.

1 6.174. Defendants lack sufficient information to admit or deny whether Plaintiff K.S.3
2 resided at Echo Glen Children's Center and therefore deny the allegation. Defendants lack
3 sufficient information to admit or deny the current residence of Plaintiff K.S.3 and therefore
4 deny the same. Defendants deny the remaining allegations of Paragraph 6.174.

5 6.175. Defendants admit Plaintiff K.S.4 was a minor when he resided at Green Hill
6 School for periods in 2001. Defendants lack sufficient information to admit or deny the current
7 residence of Plaintiff K.S.4 and therefore deny the same. Defendants deny the remaining
8 allegations of Paragraph 6.175.

9 6.176. Defendants admit Plaintiff K.T. was a minor when he resided at Green Hill
10 School for a period in 2016. Defendants admit Plaintiff K.T. resided at Green Hill School in
11 2017-2018. Defendants lack sufficient information to admit or deny the current residence of
12 Plaintiff K.T. and therefore deny the same. Defendants deny the remaining allegations of
13 Paragraph 6.176.

14 6.177. Defendants lack sufficient information to admit or deny whether Plaintiff L.C.
15 resided at Echo Glen Children's Center or a group home in Lake Forest Park, Washington and
16 therefore deny the allegations. Defendants lack sufficient information to admit or deny the
17 current residence of Plaintiff L.C. and therefore deny the same. Defendants deny the remaining
18 allegations of Paragraph 6.177.

19 6.178. Defendants admit Plaintiff L.D. was a minor when she resided at Maple Lane
20 School for periods in 2005-2006. Defendants lack sufficient information to admit or deny the
21 current residence of Plaintiff L.D. and therefore deny the same. Defendants deny the remaining
22 allegations of Paragraph 6.178.

23 6.179. Defendants admit Plaintiff L.F. was a minor when he resided at Naselle Youth
24 Camp for a period in 2011. Defendants admit that Plaintiff L.F. continued to reside at Naselle
25 Youth Camp in 2011. Defendants lack sufficient information to admit or deny the current
26 residence of Plaintiff L.F. and therefore deny the same. Defendants deny the remaining
27 allegations of Paragraph 6.179.

1 6.180. Defendants admit Plaintiff L.H. was a minor when she resided at Echo Glen
2 Children's Center for a period in 2000-2001. Defendants lack sufficient information to admit or
3 deny the current residence of Plaintiff L.H. and therefore deny the same. Defendants deny the
4 remaining allegations of Paragraph 6.180.

5 6.181. Defendants admit Plaintiff L.K was a minor when he resided at Echo Glen
6 Children's Center for periods in 2012-2015. Defendants lack sufficient information to admit or
7 deny the current residence of Plaintiff L.K. and therefore deny the same. Defendants deny the
8 remaining allegations of Paragraph 6.181.

9 6.182. Defendants admit Plaintiff L.R. was a minor when he resided at Maple Lane
10 School for periods in 2006-2008. Defendants lack sufficient information to admit or deny the
11 current residence of Plaintiff L.R. and therefore deny the same. Defendants deny the remaining
12 allegations of Paragraph 6.182.

13 6.183. Defendants admit Plaintiff L.S. was a minor when he resided at Green Hill School
14 for a period in 2009. Defendants admit Plaintiff L.S. continued to reside at Green Hill School in
15 2009-2010. Defendants lack sufficient information to admit or deny the current residence of
16 Plaintiff L.S. and therefore deny the same. Defendants deny the remaining allegations of
17 Paragraph 6.183.

18 6.184. Defendants admit Plaintiff L.S.2 was a minor when she resided at Echo Glen
19 Children's Center for periods in 2006-2008. Defendants admit Plaintiff L.S.2 continued to reside
20 at Echo Glen Children's Center in 2008. Defendants lack sufficient information to admit or deny
21 the current residence of Plaintiff L.S.2 and therefore deny the same. Defendants deny the
22 remaining allegations of Paragraph 6.184.

23 6.185. Defendants admit Plaintiff L.S.3 was a minor when he resided at Echo Glen
24 Children's Center for periods in 1996-1997. Defendants lack sufficient information to admit or
25 deny the current residence of Plaintiff L.S.3 and therefore deny the same. Defendants deny the
26 remaining allegations of Paragraph 6.185.

1 6.186. Defendants admit Plaintiff L.W. was a minor when he resided at Green Hill
2 School for a period in 2009. Defendants admit Plaintiff L.W. continued to reside at Green Hill
3 School in 2009-2010. Defendants lack sufficient information to admit or deny the current
4 residence of Plaintiff L.W. and therefore deny the same. Defendants deny the remaining
5 allegations of Paragraph 6.186.

6 6.187. Defendants admit Plaintiff M.B. was a minor when he resided at Green Hill
7 School for periods in 2002-2003. Defendants lack sufficient information to admit or deny the
8 current residence of Plaintiff M.B. and therefore deny the same. Defendants deny the remaining
9 allegations of Paragraph 6.187.

10 6.188. Defendants admit Plaintiff M.C. was a minor when he resided at Indian Ridge
11 Youth Camp for periods in 1998-1999. Defendants admit Plaintiff M.C. continued to reside at
12 Indian Ridge Youth Camp in 1999-2000. Defendants lack sufficient information to admit or
13 deny the current residence of Plaintiff M.C. and therefore deny the same. Defendants deny the
14 remaining allegations of Paragraph 6.188.

15 6.189. Defendants admit Plaintiff M.C.2 was a minor when he resided at Echo Glen
16 Children's Center for periods in 1999-2000. Defendants lack sufficient information to admit or
17 deny the current residence of Plaintiff M.C. and therefore deny the same. Defendants deny the
18 remaining allegations of Paragraph 6.189.

19 6.190. Defendants lack sufficient information to admit or deny whether Plaintiff M.D.
20 resided at Green Hill School and therefore deny the allegation. Defendants lack sufficient
21 information to admit or deny the current residence of Plaintiff M.D. and therefore deny the same.
22 Defendants deny the remaining allegations of Paragraph 6.190.

23 6.191. Defendants lack sufficient information to admit or deny whether Plaintiff M.F.
24 resided at Maple Lane School and therefore deny the allegation. Defendants lack sufficient
25 information to admit or deny the current residence of Plaintiff M.F. and therefore deny the same.
26 Defendants deny the remaining allegations of Paragraph 6.191.

1 6.192. Defendants admit Plaintiff M.G. was a minor when he resided at Indian Ridge
2 Youth Camp for a period in 1995-1996. Defendants admit Plaintiff M.G. continued to reside at
3 Indian Ridge Youth Camp in 1996. Defendants admit Plaintiff M.G. resided at Maple Lane
4 School for periods in 1996-1997. Defendants admit Plaintiff M.G. resided at Twin Rivers
5 Community Facility for periods in 1996-1997. Defendants lack sufficient information to admit
6 or deny the current residence of Plaintiff M.G. and therefore deny the same. Defendants deny
7 the remaining allegations of Paragraph 6.192.

8 6.193. Defendants admit Plaintiff M.G.2 was a minor when he resided at Green Hill
9 School for periods in 1997-2000. Defendants lack sufficient information to admit or deny the
10 current residence of Plaintiff M.G.2 and therefore deny the same. Defendants deny the
11 remaining allegations of Paragraph 6.193.

12 6.194. Defendants admit Plaintiff M.H. was a minor when he resided at Green Hill
13 School for a period in 2014. Defendants lack sufficient information to admit or deny the current
14 residence of Plaintiff M.H. and therefore deny the same. Defendants deny the remaining
15 allegations of Paragraph 6.194.

16 6.195. Defendants admit Plaintiff M.H.2 was a minor when he resided at Maple Lane
17 School for periods in 1999-2000. Defendants lack sufficient information to admit or deny the
18 current residence of Plaintiff M.H.2 and therefore deny the same. Defendants deny the
19 remaining allegations of Paragraph 6.195.

20 6.196. Defendants admit Plaintiff M.J. was a minor when he resided at Naselle Youth
21 Camp for periods in 2021-2022. Defendants lack sufficient information to admit or deny the
22 current residence of Plaintiff M.J. and therefore deny the same. Defendants deny the remaining
23 allegations of Paragraph 6.196.

24 6.197. Defendants admit Plaintiff M.K. was a minor when he resided at Naselle Youth
25 Camp for a period in 2000. Defendants admit Plaintiff M.K. continued to reside at Naselle
26 Youth Camp in 2000-2001 and 2002. Defendants lack sufficient information to admit or deny
27

1 the current residence of Plaintiff M.K. and therefore deny the same. Defendants deny the
2 remaining allegations of Paragraph 6.197.

3 6.198. Defendants admit Plaintiff M.L. was a minor when he resided at Naselle Youth
4 Camp for periods in 1992-1993. Defendants admit Plaintiff M.L. was a minor when he resided
5 at Forest Ridge Community Facility for a period in 1992. Defendants admit Plaintiff M.L.
6 resided at Naselle Youth Camp in 1994. Defendants lack sufficient information to admit or deny
7 the current residence of Plaintiff M.L. and therefore deny the same. Defendants deny the
8 remaining allegations of Paragraph 6.198.

9 6.199. Defendants admit Plaintiff M.M. was a minor when he resided at Naselle Youth
10 Camp for periods in 2006-2007. Defendants admit Plaintiff M.M. resided at Green Hill School
11 in 2009. Defendants lack sufficient information to admit or deny the current residence of
12 Plaintiff M.M. and therefore deny the same. Defendants deny the remaining allegations of
13 Paragraph 6.199.

14 6.200. Defendants admit Plaintiff M.N. was a minor when he resided at Green Hill
15 School for periods in 2014-2015. Defendants lack sufficient information to admit or deny the
16 current residence of Plaintiff M.N. and therefore deny the same. Defendants deny the remaining
17 allegations of Paragraph 6.200.

18 6.201. Defendants admit Plaintiff M.O. was a minor when he resided at Green Hill
19 School for a period in 1999. Defendants admit Plaintiff M.O. continued to reside at Green Hill
20 School in 1999-2000. Defendants lack sufficient information to admit or deny the current
21 residence of Plaintiff M.O. and therefore deny the same. Defendants deny the remaining
22 allegations of Paragraph 6.201.

23 6.202. Defendants admit Plaintiff M.P. resided at Green Hill School for periods in 2011-
24 2014. Defendants lack sufficient information to admit or deny the current residence of Plaintiff
25 M.P. and therefore deny the same. Defendants deny the remaining allegations of Paragraph
26 6.202.

1 6.203. Defendants admit Plaintiff M.P.2 was a minor when he resided at Naselle Youth
2 Camp for a period in 1996. Defendants lack sufficient information to admit or deny the current
3 residence of Plaintiff M.P.2 and therefore deny the same. Defendants deny the remaining
4 allegations of Paragraph 6.203.

5 6.204. Defendants admit Plaintiff M.P.3 was a minor when he resided at Indian Ridge
6 Youth Camp for a period in 1996. Defendants lack sufficient information to admit or deny the
7 current residence of Plaintiff M.P.3 and therefore deny the same. Defendants deny the remaining
8 allegations of Paragraph 6.204.

9 6.205. Defendants admit Plaintiff M.S. was a minor when he resided at Echo Glen
10 Children's Center for periods in 1999-2000. Defendants lack sufficient information to admit or
11 deny the current residence of Plaintiff M.S. and therefore deny the same. Defendants deny the
12 remaining allegations of Paragraph 6.205.

13 6.206. Defendants lack sufficient information to admit or deny whether Plaintiff M.V.
14 resided at Cascadia Juvenile Reception and Diagnostic Center or Maple Lane School and
15 therefore deny the allegations. Defendants lack sufficient information to admit or deny the
16 current residence of Plaintiff M.V. and therefore deny the same. Defendants deny the remaining
17 allegations of Paragraph 6.206.

18 6.207. Defendants admit Plaintiff N.B. was a minor when he resided at Green Hill
19 School for a period in 2007. Defendants lack sufficient information to admit or deny the current
20 residence of Plaintiff N.B. and therefore deny the same. Defendants deny the remaining
21 allegations of Paragraph 6.207.

22 6.208. Defendants admit Plaintiff N.B.2 was a minor when he resided at Green Hill
23 School for a period in 2004. Defendants admit Plaintiff N.B.2 continued to reside at Green Hill
24 School in 2004. Defendants lack sufficient information to admit or deny the current residence of
25 Plaintiff N.B.2 and therefore deny the same. Defendants deny the remaining allegations of
26 Paragraph 6.208.

1 6.209. Defendants admit Plaintiff N.E. was a minor when he resided at Maple Lane
2 School for periods in 2005-2008. Defendants lack sufficient information to admit or deny the
3 current residence of Plaintiff N.E. and therefore deny the same. Defendants deny the remaining
4 allegations of Paragraph 6.209.

5 6.210. Defendants admit Plaintiff N.L. was a minor when he resided at Maple Lane
6 School for a period in 2001-2003. Defendants admit Plaintiff N.L. continued to reside at Maple
7 Lane School in 2003-2004. Defendants admit Plaintiff N.L. resided at Green Hill School in
8 2004-2006. Defendants lack sufficient information to admit or deny the current residence of
9 Plaintiff N.L. and therefore deny the same. Defendants deny the remaining allegations of
10 Paragraph 6.210.

11 6.211. Defendants admit Plaintiff N.M. was a minor when he resided at Maple Lane
12 School for a period in 1999-2001. Defendants admit Plaintiff N.M. continued to reside at Maple
13 Lane School in 2001-2002. Defendants lack sufficient information to admit or deny the current
14 residence of Plaintiff N.M. and therefore deny the same. Defendants deny the remaining
15 allegations of Paragraph 6.211.

16 6.212. Defendants lack sufficient information to admit or deny whether Plaintiff N.M.2
17 resided at Echo Glen Children's Center and therefore deny the allegation. Defendants lack
18 sufficient information to admit or deny the current residence of Plaintiff N.M.2 and therefore
19 deny the same. Defendants deny the remaining allegations of Paragraph 6.212.

20 6.213. Defendants lack sufficient information to admit or deny whether Plaintiff N.M.3
21 resided at Echo Glen Children's Center and therefore deny the allegation. Defendants lack
22 sufficient information to admit or deny the current residence of Plaintiff N.M.3 and therefore
23 deny the same. Defendants deny the remaining allegations of Paragraph 6.213.

24 6.214. Defendants admit Plaintiff N.S. was a minor when she resided at Echo Glen
25 Children's Center for periods in 1999-2000. Defendants lack sufficient information to admit or
26 deny the current residence of Plaintiff N.S. and therefore deny the same. Defendants deny the
27 remaining allegations of Paragraph 6.214.

1 6.215. Defendants admit Plaintiff N.S.2 was a minor when he resided at Green Hill
2 School for a period in 2015-2016. Defendants admit Plaintiff N.S.2 continued to reside at Green
3 Hill School in 2016. Defendants lack sufficient information to admit or deny the current
4 residence of Plaintiff N.S.2 and therefore deny the same. Defendants deny the remaining
5 allegations of Paragraph 6.215.

6 6.216. Defendants admit Plaintiff P.A. was a minor when he resided at Maple Lane
7 School for a period in 1999-2000. Defendants admit Plaintiff P.A. continued to reside at Maple
8 Lane School in 2000-2001. Defendants lack sufficient information to admit or deny the current
9 residence of Plaintiff P.A. and therefore deny the same. Defendants deny the remaining
10 allegations of Paragraph 6.216.

11 6.217. Defendants admit Plaintiff P.D. was a minor when he resided at Maple Lane
12 School for a period in 2006-2009. Defendants admit Plaintiff P.D. continued to reside at Maple
13 Lane School in 2009. Defendants lack sufficient information to admit or deny the current
14 residence of Plaintiff P.D. and therefore deny the same. Defendants deny the remaining
15 allegations of Paragraph 6.217.

16 6.218. Defendants admit Plaintiff P.L. was a minor when he resided at Mission Creek
17 Youth Camp for a period in 1993-1994. Defendants admit Plaintiff P.L. continued to reside at
18 Mission Creek Youth Camp in 1994-1995. Defendants lack sufficient information to admit or
19 deny the current residence of Plaintiff P.L. and therefore deny the same. Defendants deny the
20 remaining allegations of Paragraph 6.218.

21 6.219. Defendants lack sufficient information to admit or deny whether Plaintiff P.M.
22 resided at Echo Glen Children's Center and therefore deny the allegation. Defendants lack
23 sufficient information to admit or deny the current residence of Plaintiff P.M. and therefore deny
24 the same. Defendants deny the remaining allegations of Paragraph 6.219.

25 6.220. Defendants admit Plaintiff P.O. was a minor when he resided at Maple Lane
26 School for periods in 2007-2008. Defendants lack sufficient information to admit or deny the
27

1 current residence of Plaintiff P.O. and therefore deny the same. Defendants deny the remaining
2 allegations of Paragraph 6.220.

3 6.221. Defendants lack sufficient information to admit or deny whether Plaintiff P.T.
4 resided at Echo Glen Children's Center or Oakridge Community Facility and therefore deny the
5 allegation. Defendants lack sufficient information to admit or deny the current residence of
6 Plaintiff P.T. and therefore deny the same. Defendants deny the remaining allegations of
7 Paragraph 6.221.

8 6.222. Defendants admit Plaintiff P.W. was a minor when he resided at Green Hill
9 School for periods in 2009-2010. Defendants admit Plaintiff P.W. again resided at Green Hill
10 School in 2011-2012. Defendants lack sufficient information to admit or deny the current
11 residence of Plaintiff P.W. and therefore deny the same. Defendants deny the remaining
12 allegations of Paragraph 6.222.

13 6.223. Defendants admit Plaintiff Q.B. was a minor when she resided at Echo Glen
14 Children's Center for a period in 1998. Defendants lack sufficient information to admit or deny
15 the current residence of Plaintiff Q.B. and therefore deny the same. Defendants deny the
16 remaining allegations of Paragraph 6.223.

17 6.224. Defendants admit Plaintiff R.A. was a minor when he resided at Echo Glen
18 Children's Center for periods in 1997-1998. Defendants lack sufficient information to admit or
19 deny the current residence of Plaintiff R.A. and therefore deny the same. Defendants deny the
20 remaining allegations of Paragraph 6.224.

21 6.225. Defendants lack sufficient information to admit or deny whether Plaintiff R.A.2
22 resided at Naselle Youth Camp and therefore deny the allegation. Defendants lack sufficient
23 information to admit or deny the current residence of Plaintiff R.A.2 and therefore deny the
24 same. Defendants deny the remaining allegations of Paragraph 6.225.

25 6.226. Defendants admit Plaintiff R.A.3 was a minor when he resided at Indian Ridge
26 Youth Camp for periods in 1999. Defendants admit Plaintiff R.A.3 resided at Green Hill School
27 for periods in 1999-2001. Defendants lack sufficient information to admit or deny the current

1 residence of Plaintiff R.A.3 and therefore deny the same. Defendants deny the remaining
2 allegations of Paragraph 6.226.

3 6.227. Defendants admit Plaintiff R.B. resided at Green Hill School for a period in 1995-
4 1996. Defendants lack sufficient information to admit or deny the current residence of Plaintiff
5 R.B. and therefore deny the same. Defendants deny the remaining allegations of Paragraph
6 6.227.

7 6.228. Defendants lack sufficient information to admit or deny whether Plaintiff R.B.2
8 resided at Cascadia Juvenile Reception and Diagnostic Center, Mission Creek Youth Camp, or
9 Naselle Youth Camp and therefore deny the allegations. Defendants lack sufficient information
10 to admit or deny the current residence of Plaintiff R.B.2 and therefore deny the same.
11 Defendants deny the remaining allegations of Paragraph 6.228.

12 6.229. Defendants admit Plaintiff R.C. was a minor when he resided at Green Hill
13 School for a period in 1994. Defendants lack sufficient information to admit or deny the current
14 residence of Plaintiff R.C. and therefore deny the same. Defendants deny the remaining
15 allegations of Paragraph 6.229.

16 6.230. Defendants admit Plaintiff R.D. was a minor when he resided at Indian Ridge
17 Youth Camp for periods in 1996-1997. Defendants admit Plaintiff R.D. was a minor when he
18 resided at Parke Creek Community Facility for a period in 1997. Defendants lack sufficient
19 information to admit or deny the current residence of Plaintiff R.D. and therefore deny the same.
20 Defendants deny the remaining allegations of Paragraph 6.230.

21 6.231. Defendants lack sufficient information to admit or deny whether Plaintiff R.D.2
22 resided at Echo Glen Children's Center and therefore deny the allegation. Defendants lack
23 sufficient information to admit or deny the current residence of Plaintiff R.D.2 and therefore
24 deny the same. Defendants deny the remaining allegations of Paragraph 6.231.

25 6.232. Defendants admit Plaintiff R.G. was a minor when he resided at Green Hill
26 School for a period in 1993. Defendants lack sufficient information to admit or deny the current
27

1 residence of Plaintiff R.G. and therefore deny the same. Defendants deny the remaining
2 allegations of Paragraph 6.232.

3 6.233. Defendants lack sufficient information to admit or deny whether Plaintiff R.G.2
4 resided at Fort Worden Juvenile Diagnostic and Treatment Center or Green Hill School and
5 therefore deny the allegations. Defendants lack sufficient information to admit or deny the
6 current residence of Plaintiff R.G.2 and therefore deny the same. Defendants deny the remaining
7 allegations of Paragraph 6.233.

8 6.234. Defendants admit Plaintiff R.G.3 was a minor when he resided at Indian Ridge
9 Youth Camp 1997-1998. Defendants lack sufficient information to admit or deny the current
10 residence of Plaintiff R.G.3 and therefore deny the same. Defendants deny the remaining
11 allegations of Paragraph 6.234.

12 6.235. Defendants lack sufficient information to admit or deny whether Plaintiff R.J.
13 resided at Green Hill School and therefore deny the allegation. Defendants lack sufficient
14 information to admit or deny the current residence of Plaintiff R.J. and therefore deny the same.
15 Defendants deny the remaining allegations of Paragraph 6.235.

16 6.236. Defendants lack sufficient information to admit or deny whether Plaintiff R.L.
17 resided at Echo Glen Children's Center and therefore deny the allegation. Defendants lack
18 sufficient information to admit or deny the current residence of Plaintiff R.L. and therefore deny
19 the same. Defendants deny the remaining allegations of Paragraph 6.236.

20 6.237. Defendants lack sufficient information to admit or deny whether Plaintiff R.L.2
21 resided at Echo Glen Children's Center and therefore deny the allegation. Defendants lack
22 sufficient information to admit or deny the current residence of Plaintiff R.L.2 and therefore
23 deny the same. Defendants deny the remaining allegations of Paragraph 6.237.

24 6.238. Defendants lack sufficient information to admit or deny whether Plaintiff R.M.
25 resided at Green Hill School and therefore deny the allegation. Defendants lack sufficient
26 information to admit or deny the current residence of Plaintiff R.M. and therefore deny the same.
27 Defendants deny the remaining allegations of Paragraph 6.238.

1 6.239. Defendants admit Plaintiff R.M.2 was a minor when he resided at Echo Glen
2 Children's Center in 1985. Defendants lack sufficient information to admit or deny the current
3 residence of Plaintiff R.M.2 and therefore deny the same. Defendants deny the remaining
4 allegations of Paragraph 6.239.

5 6.240. Defendants admit Plaintiff R.N. was a minor when he resided at Echo Glen
6 Children's Center in 1986-1988. Defendants lack sufficient information to admit or deny the
7 current residence of Plaintiff R.N. and therefore deny the same. Defendants deny the remaining
8 allegations of Paragraph 6.240.

9 6.241. Defendants admit Plaintiff R.N.2 was a minor when he resided at Green Hill
10 School in 1994-1995. Defendants lack sufficient information to admit or deny the current
11 residence of Plaintiff R.N.2 and therefore deny the same. Defendants deny the remaining
12 allegations of Paragraph 6.241.

13 6.242. Defendants admit Plaintiff R.P. was a minor when he resided at Echo Glen
14 Children's Center in 2003-2004. Defendants admit Plaintiff R.P. was a minor when he resided at
15 Green Hill School in 2005. Defendants admit Plaintiff R.P. was a minor when he resided at
16 Maple Lane for a period in 2005-2007. Defendants admit Plaintiff R.P. continued to reside at
17 Maple Lane in 2007. Defendants lack sufficient information to admit or deny the current
18 residence of Plaintiff R.P. and therefore deny the same. Defendants deny the remaining
19 allegations of Paragraph 6.242.

20 6.243. Defendants admit Plaintiff R.R. was a minor when he resided at Naselle Youth
21 Camp for a period in 1990. Defendants admit Plaintiff R.R. continued to reside at Naselle Youth
22 Camp in 1990-1991. Defendants lack sufficient information to admit or deny the current
23 residence of Plaintiff R.R. and therefore deny the same. Defendants deny the remaining
24 allegations of Paragraph 6.243.

25 6.244. Defendants lack sufficient information to admit or deny whether Plaintiff R.R.2
26 resided at Echo Glen Children's Center and therefore deny the allegation. Defendants lack
27

1 sufficient information to admit or deny the current residence of Plaintiff R.R.2 and therefore
2 deny the same. Defendants deny the remaining allegations of Paragraph 6.244.

3 6.245. Defendants lack sufficient information to admit or deny whether Plaintiff R.R.3
4 resided at Echo Glen Children's Center and therefore deny the allegation. Defendants lack
5 sufficient information to admit or deny the current residence of Plaintiff R.R.3 and therefore
6 deny the same. Defendants deny the remaining allegations of Paragraph 6.245.

7 6.246. Defendants lack sufficient information to admit or deny whether Plaintiff R.S.
8 resided at Mission Creek Youth Camp and therefore deny the allegation. Defendants lack
9 sufficient information to admit or deny the current residence of Plaintiff R.S. and therefore deny
10 the same. Defendants deny the remaining allegations of Paragraph 6.246.

11 6.247. Defendants admit Plaintiff R.S.2 was a minor when he resided Echo Glen
12 Children's Center in 1988-1990. Defendants lack sufficient information to admit or deny the
13 current residence of Plaintiff R.S.2 and therefore deny the same. Defendants deny the remaining
14 allegations of Paragraph 6.247.

15 6.248. Defendants admit Plaintiff R.S.3 was a minor when he resided at Parke Creek
16 Community Facility in 1989. Defendants lack sufficient information to admit or deny the current
17 residence of Plaintiff R.S.3 and therefore deny the same. Defendants deny the remaining
18 allegations of Paragraph 6.248.

19 6.249. Defendants admit Plaintiff R.W. was a minor when he resided at Naselle Youth
20 Camp in 1997. Defendants admit Plaintiff R.W. was a minor when he resided at Camp Outlook
21 in 1997 and 1998. Defendants lack sufficient information to admit or deny the current residence
22 of Plaintiff R.W. and therefore deny the same. Defendants deny the remaining allegations of
23 Paragraph 6.249.

24 6.250. Defendants admit Plaintiff R.W.2 was a minor when he resided at Mission Creek
25 Youth Camp in 2000-2001. Defendants lack sufficient information to admit or deny the current
26 residence of Plaintiff R.W.2 and therefore deny the same. Defendants deny the remaining
27 allegations of Paragraph 6.250.

1 6.251. Defendants admit Plaintiff S.B. was a minor when he resided at Echo Glen
2 Children's Center in 2003-2004. Defendants admit Plaintiff S.B. was a minor when he resided at
3 Green Hill School in 2004-2007. Defendants lack sufficient information to admit or deny the
4 current residence of Plaintiff S.B. and therefore deny the same. Defendants deny the remaining
5 allegations of Paragraph 6.251.

6 6.252. Defendants admit Plaintiff S.C. was a minor when he resided at Naselle Youth
7 Camp in 1998-1999. Defendants lack sufficient information to admit or deny the current
8 residence of Plaintiff S.C. and therefore deny the same. Defendants deny the remaining
9 allegations of Paragraph 6.252.

10 6.253. Defendants lack sufficient information to admit or deny whether Plaintiff S.C.2
11 resided at Maple Lane School and therefore deny the allegation. Defendants lack sufficient
12 information to admit or deny the current residence of Plaintiff S.C.2 and therefore deny the same.
13 Defendants deny the remaining allegations of Paragraph 6.253.

14 6.254. Defendants admit Plaintiff S.C.3 was a minor when he resided at Maple Lane
15 School in 1997-1998. Defendants lack sufficient information to admit or deny the current
16 residence of Plaintiff S.C.3 and therefore deny the same. Defendants deny the remaining
17 allegations of Paragraph 6.254.

18 6.255. Defendants admit Plaintiff S.D. was a minor when he resided at Echo Glen
19 Children's Center in 1983-1984. Defendants lack sufficient information to admit or deny the
20 current residence of Plaintiff S.D. and therefore deny the same. Defendants deny the remaining
21 allegations of Paragraph 6.255.

22 6.256. Defendants admit Plaintiff S.E. was a minor when he resided at Naselle Youth
23 Camp in 2000-2001. Defendants lack sufficient information to admit or deny the current
24 residence of Plaintiff S.E. and therefore deny the same. Defendants deny the remaining
25 allegations of Paragraph 6.256.

26 6.257. Defendants admit Plaintiff S.G. was a minor when he resided at Maple Lane
27 School in 1998. Defendants lack sufficient information to admit or deny the current residence of

1 Plaintiff S.G. and therefore deny the same. Defendants deny the remaining allegations of
2 Paragraph 6.257.

3 6.258. Defendants admit Plaintiff S.K. was a minor when he resided at Green Hill
4 School for periods in 1995-1998. Defendants lack sufficient information to admit or deny the
5 current residence of Plaintiff S.K. and therefore deny the same. Defendants deny the remaining
6 allegations of Paragraph 6.258.

7 6.259. Defendants lack sufficient information to admit or deny whether Plaintiff S.K.2
8 resided at Maple Lane School and therefore deny the allegation. Defendants lack sufficient
9 information to admit or deny the current residence of Plaintiff S.K.2 and therefore deny the
10 same. Defendants deny the remaining allegations of Paragraph 6.259.

11 6.260. Defendants admit Plaintiff S.L. was a minor when he resided at Echo Glen
12 Children's Center in 1998-2000. Defendants admit Plaintiff S.L. was a minor when he resided at
13 Maple Lane School in 2000-2002. Defendants lack sufficient information to admit or deny the
14 current residence of Plaintiff S.L. and therefore deny the same. Defendants deny the remaining
15 allegations of Paragraph 6.260.

16 6.261. Defendants admit Plaintiff S.M. was a minor when he resided at Echo Glen
17 Children's Center in 1988. Defendants lack sufficient information to admit or deny the current
18 residence of Plaintiff S.M. and therefore deny the same. Defendants deny the remaining
19 allegations of Paragraph 6.261.

20 6.262. Defendants admit Plaintiff S.M.2 was a minor when he resided at Naselle Youth
21 Camp in 2002. Defendants lack sufficient information to admit or deny the current residence of
22 Plaintiff S.M.2 and therefore deny the same. Defendants deny the remaining allegations of
23 Paragraph 6.262.

24 6.263. Defendants admit Plaintiff S.P. was a minor when he resided at Naselle Youth
25 Camp in 2021. Defendants lack sufficient information to admit or deny the current residence of
26 Plaintiff S.P. and therefore deny the same. Defendants deny the remaining allegations of
27 Paragraph 6.263.

1 6.264. Defendants admit Plaintiff S.V. was a minor when he resided at Maple Lane
2 School in 1999-2002. Defendants lack sufficient information to admit or deny the current
3 residence of Plaintiff S.V. and therefore deny the same. Defendants deny the remaining
4 allegations of Paragraph 6.264.

5 6.265. Defendants admit Plaintiff T.B. was a minor when he resided at Maple Lane
6 School in 2009-2010. Defendants lack sufficient information to admit or deny the current
7 residence of Plaintiff T.B. and therefore deny the same. Defendants deny the remaining
8 allegations of Paragraph 6.265.

9 6.266. Defendants admit Plaintiff T.C. was a minor when she resided at Echo Glen
10 Children's Center in 1997-1998. Defendants lack sufficient information to admit or deny the
11 current residence of Plaintiff T.C. and therefore deny the same. Defendants deny the remaining
12 allegations of Paragraph 6.266.

13 6.267. Defendants admit Plaintiff T.D. was a minor when he resided at Naselle Youth
14 Camp in 2003. Defendants lack sufficient information to admit or deny the current residence of
15 Plaintiff T.D. and therefore deny the same. Defendants deny the remaining allegations of
16 Paragraph 6.266.

17 6.268. Defendants admit Plaintiff T.E. was a minor when he resided at Echo Glen
18 Children's Center in 1997. Defendants lack sufficient information to admit or deny the current
19 residence of Plaintiff T.E. and therefore deny the same. Defendants deny the remaining
20 allegations of Paragraph 6.267.

21 6.269. Defendants admit Plaintiff T.F. was a minor when he resided at Echo Glen
22 Children's Center in 1984-1985. Defendants lack sufficient information to admit or deny the
23 current residence of Plaintiff T.F. and therefore deny the same. Defendants deny the remaining
24 allegations of Paragraph 6.269.

25 6.270. Defendants admit Plaintiff T.H. was a minor when he resided at Echo Glen
26 Children's Center in 1990-1991. Defendants lack sufficient information to admit or deny the
27

1 current residence of Plaintiff T.H. and therefore deny the same. Defendants deny the remaining
2 allegations of Paragraph 6.270.

3 6.271. Defendants admit Plaintiff T.J. was a minor when he resided at Maple Lane
4 School for a period in 1998-2000. Defendants admit Plaintiff T.J. continued to reside at Maple
5 Lane School in 2000-2002. Defendants lack sufficient information to admit or deny the current
6 residence of Plaintiff T.J. and therefore deny the same. Defendants deny the remaining
7 allegations of Paragraph 6.271.

8 6.272. Defendants admit Plaintiff T.K. was a minor when he resided at Echo Glen
9 Children's Center in 2008-2009. Defendants lack sufficient information to admit or deny the
10 current residence of Plaintiff T.K. and therefore deny the same. Defendants deny the remaining
11 allegations of Paragraph 6.272.

12 6.273. Defendants admit Plaintiff T.K.2 was a minor when he resided at Naselle Youth
13 Camp in 1998. Defendants lack sufficient information to admit or deny the current residence of
14 Plaintiff T.K.2 and therefore deny the same. Defendants deny the remaining allegations of
15 Paragraph 6.273.

16 6.274. Defendants lack sufficient information to admit or deny whether Plaintiff T.L.
17 resided at Echo Glen Children's Center and therefore deny the allegation. Defendants lack
18 sufficient information to admit or deny the current residence of Plaintiff T.L. and therefore deny
19 the same. Defendants deny the remaining allegations of Paragraph 6.274.

20 6.275. Defendants admit Plaintiff T.M. was a minor when she resided at Echo Glen
21 Children's Center in 1988-1989. Defendants lack sufficient information to admit or deny the
22 current residence of Plaintiff T.M. and therefore deny the same. Defendants deny the remaining
23 allegations of Paragraph 6.275.

24 6.276. Defendants admit Plaintiff T.M.2 was a minor when he resided at Green Hill
25 School in 1995-1996. Defendants lack sufficient information to admit or deny the current
26 residence of Plaintiff T.M.2 and therefore deny the same. Defendants deny the remaining
27 allegations of Paragraph 6.276.

1 6.277. Defendants admit Plaintiff T.M.3 was a minor when he resided at Maple Lane
2 School for a period in 2007-2008. Defendants admit Plaintiff T.M.3 continued to reside at
3 Maple Lane School in 2008-2010. Defendants lack sufficient information to admit or deny the
4 current residence of Plaintiff T.M.3 and therefore deny the same. Defendants deny the
5 remaining allegations of Paragraph 6.277.

6 6.278. Defendants admit Plaintiff T.N. was a minor when he resided at Mission Creek
7 Youth Camp in 2000-2002. Defendants lack sufficient information to admit or deny the current
8 residence of Plaintiff T.N. and therefore deny the same. Defendants deny the remaining
9 allegations of Paragraph 6.278.

10 6.279. Defendants admit Plaintiff T.P. was a minor when he resided at Naselle Youth
11 Camp in 1992-1994. Defendants lack sufficient information to admit or deny the current
12 residence of Plaintiff T.P. and therefore deny the same. Defendants deny the remaining
13 allegations of Paragraph 6.279.

14 6.280. Defendants admit Plaintiff T.R. was a minor when she resided at Naselle Youth
15 Camp in 2002-2003. Defendants lack sufficient information to admit or deny the current
16 residence of Plaintiff T.R. and therefore deny the same. Defendants deny the remaining
17 allegations of Paragraph 6.280.

18 6.281. Defendants lack sufficient information to admit or deny whether Plaintiff T.R.2
19 resided at Parke Creek Community Facility and therefore deny the allegation. Defendants lack
20 sufficient information to admit or deny the current residence of Plaintiff T.R.2 and therefore
21 deny the same. Defendants deny the remaining allegations of Paragraph 6.281.

22 6.282. Defendants admit Plaintiff T.V. was a minor when he resided at Echo Glen
23 Children's Center in 2009-2011. Defendants lack sufficient information to admit or deny the
24 current residence of Plaintiff T.V. and therefore deny the same. Defendants deny the remaining
25 allegations of Paragraph 6.282.

26 6.283. Defendants lack sufficient information to admit or deny whether Plaintiff T.W.
27 resided at Naselle Youth Camp or Green Hill School. Defendants lack sufficient information to

1 admit or deny the current residence of Plaintiff T.W. and therefore deny the same. Defendants
2 deny the remaining allegations of Paragraph 6.283.

3 6.284. Defendants admit Plaintiff T.W.2 was a minor when he resided at Echo Glen
4 Children's Center in 1999-2000. Defendants lack sufficient information to admit or deny the
5 current residence of Plaintiff T.W.2 and therefore deny the same. Defendants deny the
6 remaining allegations of Paragraph 6.284.

7 6.285. Defendants lack sufficient information to admit or deny whether Plaintiff T.W.3
8 resided at Parke Creek Community Facility and therefore deny the allegation. Defendants lack
9 sufficient information to admit or deny the current residence of Plaintiff T.W.3 and therefore
10 deny the same. Defendants deny the remaining allegations of Paragraph 6.285.

11 6.286. Defendants lack sufficient information to admit or deny whether Plaintiff U.H.
12 resided at Green Hill School and therefore deny the allegation. Defendants lack sufficient
13 information to admit or deny the current residence of Plaintiff U.H. and therefore deny the same.
14 Defendants deny the remaining allegations of Paragraph 6.286.

15 6.287. Defendants admit Plaintiff V.M. was a minor when she resided at Echo Glen
16 Children's Center in 1998-1999 and 2000-2001. Defendants lack sufficient information to admit
17 or deny the current residence of Plaintiff V.M. and therefore deny the same. Defendants deny
18 the remaining allegations of Paragraph 6.287.

19 6.288. Defendants lack sufficient information to admit or deny whether Plaintiff V.P.
20 resided at Echo Glen Children's Center and therefore deny the allegation. Defendants lack
21 sufficient information to admit or deny the current residence of Plaintiff V.P. and therefore deny
22 the same. Defendants deny the remaining allegations of Paragraph 6.288.

23 6.289. Defendants admit Plaintiff V.P.2 was a minor when he resided at Naselle Youth
24 Camp in 2007. Defendants lack sufficient information to admit or deny the current residence of
25 Plaintiff V.P.2 and therefore deny the same. Defendants deny the remaining allegations of
26 Paragraph 6.289.

1 6.290. Defendants admit Plaintiff V.S. was a minor when he resided at Maple Lane
2 School in 1997-2000. Defendants admit Plaintiff V.S. was a minor when he resided at Green
3 Hill School for a period in 2000-2001. Defendants admit Plaintiff V.S. continued to reside at
4 Green Hill School in 2001-2003. Defendants lack sufficient information to admit or deny the
5 current residence of Plaintiff V.S. and therefore deny the same. Defendants deny the remaining
6 allegations of Paragraph 6.290.

7 6.291. Defendants admit Plaintiff V.S.2 was a minor when he resided at Green Hill
8 School for a period in 2009-2010. Defendants admit Plaintiff V.S.2 continued to reside at Green
9 Hill School in 2010. Defendants lack sufficient information to admit or deny the current
10 residence of Plaintiff V.S.2 and therefore deny the same. Defendants deny the remaining
11 allegations of Paragraph 6.291.

12 6.292. Defendants admit Plaintiff V.T. was a minor when he resided at Mission Creek
13 Youth Camp in 1999 and for a period in 2001. Defendants admit Plaintiff V.T. continued to
14 reside at Mission Creek Youth Camp in 2001. Defendants lack sufficient information to admit or
15 deny the current residence of Plaintiff V.T. and therefore deny the same. Defendants deny the
16 remaining allegations of Paragraph 6.292.

17 6.293. Defendants admit Plaintiff W.H. was a minor when he resided at Green Hill
18 School for a period in 1986. Defendants admit Plaintiff W.H. continued to reside at Green Hill
19 School in 1986-1987. Defendants lack sufficient information to admit or deny the current
20 residence of Plaintiff W.H. and therefore deny the same. Defendants deny the remaining
21 allegations of Paragraph 6.293.

22 6.294. Defendants lack sufficient information to admit or deny whether Plaintiff W.M.
23 resided at Cascadia Juvenile Reception and Diagnostic Center and therefore deny the allegation.
24 Defendants lack sufficient information to admit or deny the current residence of Plaintiff W.M.
25 and therefore deny the same. Defendants deny the remaining allegations of Paragraph 6.294.

26 6.295. Defendants admit Plaintiff W.M.2 was a minor when he resided at Mission Creek
27 Youth Camp in 1987-1988. Defendants lack sufficient information to admit or deny the current

1 residence of Plaintiff W.M.2 and therefore deny the same. Defendants deny the remaining
2 allegations of Paragraph 6.295.

3 6.296. Defendants lack sufficient information to admit or deny whether Plaintiff W.W.
4 resided at Green Hill School and therefore deny the allegation. Defendants lack sufficient
5 information to admit or deny the current residence of Plaintiff W.W. and therefore deny the
6 same. Defendants deny the remaining allegations of Paragraph 6.296.

7 6.297. Defendants admit Plaintiff Z.H. was a minor when he resided at Echo Glen
8 Children's Center for a period in 2008-2009. Defendants lack sufficient information to admit or
9 deny the current residence of Plaintiff Z.H. and therefore deny the same. Defendants deny the
10 remaining allegations of Paragraph 6.297.

11 6.298. Defendants admit Plaintiff Z.K. was a minor when he resided at Naselle Youth
12 Camp in 2010-2011. Defendants lack sufficient information to admit or deny the current
13 residence of Plaintiff Z.K. and therefore deny the same. Defendants deny the remaining
14 allegations of Paragraph 6.298.

15 **VII. LIABILITY**

16 The allegations in Section VII of the Complaint contain legal arguments and legal
17 conclusions to which no response is required. Defendants deny the remaining allegations in
18 Section VII. Defendants deny their actions were the cause of Plaintiffs' alleged injuries.

19 **VIII. DAMAGES**

20 Defendants deny the allegations in Section VIII.

21 **IX. JURY DEMAND**

22 Section IX contains legal argument and legal conclusions to which no response is
23 required. Defendants otherwise admit the Complaint demands the case be tried by a jury.

24 **X. PRAYER FOR RELIEF**

25 Defendants deny Plaintiffs are entitled to any of the relief or damages identified in their
26 Prayer for Relief set out in Section X, Paragraphs (1)-(5) of the Complaint. Defendants further
27 deny any and all allegations set forth in the Complaint that are not expressly admitted above.

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By Way of FURTHER ANSWER and SECOND AFFIRMATIVE DEFENSE,
Defendants allege that Plaintiffs' claims are barred by the statute of limitations.

By Way of FURTHER ANSWER and FOURTH AFFIRMATIVE DEFENSE,
Defendants allege Plaintiffs have failed to state a claim upon which relief may be granted.

By Way of FURTHER ANSWER and SIXTH AFFIRMATIVE DEFENSE, Defendants allege they are entitled to an offset from any award to Plaintiffs herein and/or recovery of back monies paid to Plaintiffs.

By Way of FURTHER ANSWER and EIGHTH AFFIRMATIVE DEFENSE, Defendants allege that the county in which this action has been commenced is not the proper venue for said action.

1 By Way of FURTHER ANSWER and NINTH AFFIRMATIVE DEFENSE, Defendants
2 allege that any damages and injuries sustained by Plaintiffs may have pre-existed the subject
3 incidents, or were caused by subsequent events and instrumentalities, which may be identified
4 during the course of discovery, having no connection or relationship with these Defendants.
5 Defendants therefore request that fault and Plaintiffs' damages, if any, be apportioned
6 accordingly.

7 By Way of FURTHER ANSWER and TENTH AFFIRMATIVE DEFENSE, Defendants
8 allege that Plaintiffs have failed to file a claim against Defendants as required by RCW 4.92.100
9 and RCW 4.92.110, or that the claims filed are insufficient.

10 By Way of FURTHER ANSWER and ELEVENTH AFFIRMATIVE DEFENSE,
11 Defendants allege that Plaintiffs' actions against Defendants are barred by the doctrine of res
12 judicata and/or collateral estoppel.

13 By Way of FURTHER ANSWER and TWELFTH AFFIRMATIVE DEFENSE,
14 Defendants allege that Plaintiffs have failed to join an indispensable party or parties and
15 therefore the action will not lie.

16 By Way of FURTHER ANSWER and THIRTEENTH AFFIRMATIVE DEFENSE,
17 Defendants allege that all actions of Defendants herein alleged as negligence, manifest a
18 reasonable exercise of judgment and discretion by authorized public officials made in the
19 exercise of governmental authority entrusted to them by law and are neither tortious nor
20 actionable.

21 By Way of FURTHER ANSWER and FOURTEENTH AFFIRMATIVE DEFENSE,
22 Defendants allege that Plaintiffs lack capacity to sue.

23 By Way of FURTHER ANSWER and FIFTEENTH AFFIRMATIVE DEFENSE,
24 Defendants allege that Plaintiffs' claims are barred by waiver.

25 By Way of FURTHER ANSWER and SIXTEENTH AFFIRMATIVE DEFENSE,
26 Defendants allege that Plaintiffs' claims are barred by estoppel.
27

1 By Way of FURTHER ANSWER and SEVENTEENTH AFFIRMATIVE DEFENSE,
2 Defendants allege that Plaintiffs' claims have been released.

3 By Way of FURTHER ANSWER and EIGHTEENTH AFFIRMATIVE DEFENSE,
4 Defendants allege that Defendants are not subject to liability under vicarious liability, *respondeat*
5 *superior*, or other agency theories for the conduct of third parties, including but not limited to
6 employees, volunteers, contractors, and others.

7 By Way of FURTHER ANSWER and NINETEENTH AFFIRMATIVE DEFENSE,
8 Defendants allege that acts or omissions were done in conjunction with their performance of
9 lawmaking functions, including purely legislative activity, discretionary policymaking, and
10 participation in the legislative process.

11 By Way of FURTHER ANSWER and TWENTIETH AFFIRMATIVE DEFENSE,
12 Defendants allege that this action is barred by RCW 4.24.595(2).

13 By Way of FURTHER ANSWER and TWENTY-FIRST AFFIRMATIVE DEFENSE,
14 Defendants allege they did not act with gross negligence in the investigation of referrals alleging
15 abuse and neglect under RCW 4.24.595(1).

16 Defendants reserve the right to amend this Answer to include additional claims or
17 defenses as may be required.

18 XII. DEFENDANTS' RESERVATION OF RIGHTS

19 Defendants reserve the right to amend this Answer, including the addition of affirmative
20 defenses warranted by investigation and discovery, and to make such amendments either before
21 or during trial, including asserting other defense theories or conforming the pleadings to the
22 proof offered at the time of trial.

23 XIII. NO WAIVER

24 Defendants, by their answers and admissions, waive no burden of proof, presumptions, or
25 other legal characterizations to which they are entitled and expressly reserve the right to assert
26 the same.

1 **XIV. DEFENDANTS' PRAYER FOR RELIEF**

2 WHEREFORE, Defendants pray that the Complaint be dismissed with prejudice as to
3 Defendants, that Plaintiffs take nothing by their Complaint, and that Defendants be allowed their
4 costs and reasonable attorney fees herein.

5 DATED: July 2, 2025.

MARKOWITZ HERBOLD PC

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7 s/ Lauren F. Blaesin

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DEFENDANTS' ANSWER AND AFFIRMATIVE DEFENSES TO PLAINTIFFS'

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