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KING COUNTY
SUPERIOR COURT CLERK
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CASE #: 24-2-20053-3 SEA

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

A.B., et al. individuals,

Plaintiffs,

v.

THE STATE OF WASHINGTON and its
agencies, DEPARTMENT OF CHILDREN,
YOUTH, AND FAMILY, DEPARTMENT
OF SOCIAL AND HEALTH SERVICES,
and JUVENILE REHABILITATION
ADMINISTRATION,

Defendants.

A.A., et al. individuals,

Plaintiffs,

v.

THE STATE OF WASHINGTON and its
agencies, DEPARTMENT OF CHILDREN,
YOUTH, AND FAMILY, DEPARTMENT
OF SOCIAL AND HEALTH SERVICES,
and JUVENILE REHABILITATION
ADMINISTRATION,

Defendants.

Case No. 24-2-20053-3 SEA [Lead]
Case No. 24-2-25097-2 SEA

**DEFENDANTS' ANSWER TO A.A.
PLAINTIFFS' AMENDED
COMPLAINT**

Defendants State of Washington, Department of Children, Youth, and Families,
Department of Social and Health Services, and Juvenile Rehabilitation Administration
(collectively, "Defendants"), by and through their undersigned counsel of record, hereby appear

1 in the above-entitled matter in answer to Plaintiffs’ Amended Complaint in *A.A. et al. v. The*
2 *State of Washington, et al.*, Case No. 24-2-25097-2 SEA, and admit, deny, and allege as follows:

3 **I. INTRODUCTION**

4 1.1. The allegations in Paragraph 1.1 of Plaintiffs’ Amended Complaint contain legal
5 arguments and legal conclusions to which no response is required. To the extent a response is
6 required, Defendants deny the allegations contained therein.

7 1.2. The allegations in Paragraph 1.2 of Plaintiffs’ Amended Complaint contain legal
8 arguments and legal conclusions to which no response is required. To the extent a response is
9 required, Defendants deny the allegations contained therein.

10 1.3. The allegations in Paragraph 1.3 of Plaintiffs’ Amended Complaint contain legal
11 arguments and legal conclusions to which no response is required. To the extent a response is
12 required, Defendants deny the allegations contained therein.

13 1.4. The allegations in Paragraph 1.4 of Plaintiffs’ Amended Complaint contain legal
14 arguments and legal conclusions to which no response is required. To the extent a response is
15 required, Defendants deny the allegations contained therein.

16 1.5. Defendants admit employees have been the subject of criminal and civil actions.
17 Defendants deny the remaining allegations in paragraph 1.5.

18 1.6. The allegations in Paragraph 1.6 of Plaintiffs’ Amended Complaint contain legal
19 arguments and legal conclusions to which no response is required. To the extent a response is
20 required, Defendants deny the allegations contained therein.

21 **II. PARTIES**

22 2.1. Defendants admit that the Department of Children, Youth, and Families
23 (“DCYF”) and the Department of Social and Health Services (“DSHS”) are agencies of the State
24 of the Washington. Defendants deny that Juvenile Rehabilitation Administration is a separate
25 agency of the State of Washington because it joined with DCYF in 2019 and is not a separate
26 agency. DCYF and DSHS are therefore the real parties in interest. The remaining allegations in
27 Paragraph 2.1 of Plaintiffs’ Amended Complaint contain legal arguments and legal conclusions

1 to which no response is required. To the extent a response is required, Defendants deny the
2 allegations contained therein.

3 2.2. The allegations in Paragraph 2.2 of Plaintiffs' Amended Complaint contain legal
4 arguments and legal conclusions to which no response is required. To the extent a response is
5 required, Defendants deny the allegations contained therein.

6 2.3. The allegations in Paragraph 2.3 of Plaintiffs' Amended Complaint contain legal
7 arguments and legal conclusions to which no response is required. To the extent a response is
8 required, Defendants deny the allegations contained therein.

9 **III. JURISDICTION AND VENUE**

10 3.1. Defendants admit the Superior Court generally has jurisdiction of this case, but
11 deny King County is the proper venue for this action.

12 3.2. Defendants deny venue is proper in King County.

13 **IV. STATUTE OF LIMITATIONS**

14 4.1. The allegations in Paragraph 4.1 of Plaintiffs' Amended Complaint contain legal
15 arguments and legal conclusions to which no response is required. To the extent a response is
16 required, Defendants deny the allegations contained therein.

17 **V. BACKGROUND INFORMATION**

18 5.1. The allegations in Paragraph 5.1 of Plaintiffs' Amended Complaint contain legal
19 arguments and legal conclusions to which no response is required. To the extent the paragraph
20 references specific Session Laws for the State of Washington and state laws, those laws speak for
21 themselves.

22 5.2. The allegations in Paragraph 5.2 of Plaintiffs' Amended Complaint contain legal
23 arguments and legal conclusions to which no response is required. To the extent the paragraph
24 references specific Session Laws for the State of Washington, those laws speak for themselves.

25 5.3. The allegations in Paragraph 5.3 of Plaintiffs' Amended Complaint contain legal
26 arguments and legal conclusions to which no response is required. To the extent the paragraph
27

1 references specific Session Laws for the State of Washington and case law, those references
2 speak for themselves.

3 5.4. The allegations in Paragraph 5.4 of Plaintiffs' Amended Complaint contain legal
4 arguments and legal conclusions to which no response is required. To the extent the paragraph
5 references specific Session Laws for the State of Washington, those laws speak for themselves.

6 5.5. The allegations in Paragraph 5.5 of Plaintiffs' Amended Complaint contain legal
7 arguments and legal conclusions to which no response is required. To the extent the paragraph
8 references specific Session Laws for the State of Washington, those laws speak for themselves.

9 5.6. The allegations in Paragraph 5.6 of Plaintiffs' Amended Complaint contain legal
10 arguments and legal conclusions to which no response is required. To the extent the paragraph
11 references specific Session Laws for the State of Washington, those laws speak for themselves.

12 5.7. The allegations in Paragraph 5.7 of Plaintiffs' Amended Complaint contain legal
13 arguments and legal conclusions to which no response is required. To the extent the paragraph
14 references specific Session Laws for the State of Washington, those laws speak for themselves.

15 5.8. The allegations in Paragraph 5.8 of Plaintiffs' Amended Complaint contain legal
16 arguments and legal conclusions to which no response is required. To the extent the paragraph
17 references specific Session Laws for the State of Washington, those laws speak for themselves.

18 5.9. Defendants admit that it operated or operates two facilities named Green Hill
19 School and Maple Lane School. Defendants admit that Green Hill School is located in Chehalis
20 but Maple Lane School is located in Rochester. The remaining allegations in Paragraph 5.9 of
21 Plaintiffs' Amended Complaint contain legal arguments and legal conclusions to which no
22 response is required. The Session Laws and state laws for the State of Washington cited in
23 Plaintiffs' Amended Complaint speak for themselves.

24 5.10. The allegations in Paragraph 5.10 of Plaintiffs' Amended Complaint contain legal
25 arguments and legal conclusions to which no response is required. To the extent the paragraph
26 references specific publications and reference materials, case law and state laws, Defendants
27

1 admit that the contents of the publications speak for themselves, and Defendants neither admit
2 nor deny the accuracy of those publications.

3 5.11. The allegations in Paragraph 5.11 of Plaintiffs' Amended Complaint contain legal
4 arguments and legal conclusions to which no response is required. Defendants deny the
5 remaining allegations in paragraph 5.11.

6 5.12. The allegations in Paragraph 5.12 of Plaintiffs' Amended Complaint contain legal
7 arguments and legal conclusions to which no response is required. To the extent the paragraph
8 references specific Session Laws and state laws for the State of Washington, those laws speak for
9 themselves. Defendants admit that, by the 1980s, they operated the facilities listed in paragraph
10 5.12, some of which were juvenile correctional facilities. Defendants deny that all the facilities
11 listed were juvenile correctional facilities.

12 5.13. The allegations in Paragraph 5.13 of Plaintiffs' Amended Complaint contain legal
13 arguments and legal conclusions to which no response is required. To the extent the paragraph
14 references specific Session Laws and statutes for the State of Washington, those laws speak for
15 themselves.

16 5.14. Defendants admit that DCYF was created in 2017 by the Washington State
17 Legislature, and functions performed by the Children's Administration within DSHS were
18 transferred, along with all liabilities, to DCYF on July 1, 2018. To the extent the paragraph
19 references specific Session Laws for the State of Washington, those laws speak for themselves.

20 5.15. Defendants admit that Juvenile Rehabilitation Administration moved to DCYF in
21 2019. Defendants deny the remaining allegations in paragraph 5.15.

22 5.16. The allegations in Paragraph 5.16 of Plaintiffs' Amended Complaint contain legal
23 arguments and legal conclusions to which no response is required. The allegations also include
24 quotes to which there is no attribution, making confirmation impossible. To the extent a response
25 is required, Defendants deny the allegations contained therein.

26 5.17. Defendants deny the allegations in paragraph 5.17.
27

1 5.18. The allegations in Paragraph 5.18 of Plaintiffs' Amended Complaint contain legal
2 arguments and legal conclusions to which no response is required. To the extent a response is
3 required, Defendants deny the allegations contained therein.

- 4 a. Defendants admit that Echo Glen Children's Center is located in King County,
5 Washington. Defendants admit that Echo Glen Children's Center is a
6 medium/maximum state juvenile correctional facility that houses both male and
7 female individuals, including male and female youth. Defendants deny the
8 remaining allegations in this paragraph.
- 9 b. Defendants admit that Green Hill School is located in Lewis County, Washington.
10 Defendants admit that Green Hill School is a medium/maximum security state
11 juvenile correctional facility that houses male individuals, including male youth.
12 Defendants deny the remaining allegations in this paragraph.
- 13 c. Defendants admit Naselle Youth Camp was located in Pacific County,
14 Washington, was a medium security state juvenile correctional facility that
15 housed males. Defendants admit before its closure in 2022, Naselle Youth Camp
16 partnered with the Washington State Department of Natural Resources and
17 Department of Fish and Wildlife to facilitate work programs for the residents.
18 Defendants deny the remaining allegations in this paragraph.
- 19 d. Defendants admit Maple Lane School is located in Thurston County, Washington
20 and, at the time of its closure in 2011, was a medium/maximum security state
21 juvenile correctional facility that housed male individuals, including male youth.
22 Defendants further admit Maple Lane School housed female individuals,
23 including female youth at the time it opened, but eventually transitioned to an all-
24 male facility. Defendants further admits Maple Lane School reopened in 2016
25 and houses adult DSHS clients.
- 26 e. Defendants admit Mission Creek Youth Camp was located in Mason County,
27 Washington. Defendants admit Mission Creek Youth Camp was built on land

1 leased from the Washington State Department of Natural Resources, which
2 facilitated a work program for the residents. Defendants admit Mission Creek
3 Youth Camp opened in 2005 as the Mission Creek Corrections Center for
4 Women.

5 f. Defendants admit that Indian Ridge Youth Camp was located in Snohomish
6 County, Washington. Defendants admit it was a state-operated facility housing
7 juvenile offenders. Defendants deny the remaining allegations in this paragraph.

8 g. Defendants admit that Cascadia Juvenile Reception and Diagnostic Center was
9 located in Pierce County, Washington. Defendants admit it was a state-operated
10 facility for juvenile detainees. Defendants deny the remaining allegations in this
11 paragraph.

12 h. Defendants admit that Child Study and Treatment Center is located in Pierce
13 County, Washington. Defendants admit it provides in-patient mental health
14 treatment for youth. Defendants deny the remaining allegations in this paragraph.

15 i. Defendants admit that Sunrise Community Facility is located in Grant County,
16 Washington. Defendants admit it is a state-operated community facility for
17 juvenile offenders. Defendants deny the remaining allegations in this paragraph.

18 j. Defendants admit that Woodinville Community Facility is located in King
19 County, Washington. Defendants admit it is a state-operated community facility
20 for juvenile offenders. Defendants deny the remaining allegations in this
21 paragraph.

22 k. Defendants admit that Parke Creek Community Facility is located in Kittitas
23 County, Washington. Defendants admit it is a state-operated community facility
24 for juvenile offenders. Defendants deny the remaining allegations in this
25 paragraph.

- 1 l. Defendants admit that Oakridge Community Facility is located in Pierce County,
2 Washington. Defendants admit it is a state-operated community facility for
3 juvenile offenders. Defendants deny the remaining allegations in this paragraph.
- 4 m. Defendants admit that Canyon View is located in Douglas County near the border
5 with Chelan County, Washington. Defendants admit it is a state-operated
6 community facility for juvenile offenders. Defendants deny the remaining
7 allegations in this paragraph.
- 8 n. Defendants admit that Ruth Dykeman Children's Center was located in King
9 County, Washington. Defendants admit it was a facility licensed to accept
10 dependent youths in the care of DCYF.
- 11 o. Defendants admit that Twin Rivers Community Facility is located in Benton
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 p. Defendants admit that Griffin Home – Friends of Youth was located in King
16 County, Washington. Defendants admit it was a facility licensed to accept
17 dependent youths in the care of DCYF.
- 18 q. Defendants admit that Haven House is located in Thurston County, Washington.
19 Defendants admit it was a facility licensed to accept dependent youths in the care
20 of DCYF.
- 21 r. Defendants admit that Cedar Creek Youth Forestry Camp was located in Thurston
22 County, Washington. Defendants admit it was a state-operated facility housing
23 juvenile offenders. Defendants deny the remaining allegations in this paragraph.
- 24 s. Defendants admit that Camp Outlook was located in Franklin County,
25 Washington. Defendants admit it was a state-operated facility housing juvenile
26 offenders. Defendants deny the remaining allegations in this paragraph.
27

- 1 t. Defendants admit that Fort Worden Diagnostic Center was located in Jefferson
2 County, Washington. Defendants admit that it was a state-operated correctional
3 juvenile treatment and diagnostic center.
- 4 u. Defendants admit that Touchstone Community Facility is located in Thurston
5 County, Washington. Defendants admit it is currently a state-operated
6 community facility for juvenile offenders. Defendants deny they have always
7 operated Touchstone Community Facility. Defendants deny the remaining
8 allegations in this paragraph.
- 9 v. Defendants admit that Hutton Settlement Home is located in Spokane County,
10 Washington. Defendants admit it was a facility licensed to accept dependent
11 youths in the care of DCYF.
- 12 w. Defendants admit that Kamp Kachess/Double K Ranch was located in Kittitas
13 County, Washington. Defendants admit it was a state-contracted facility housing
14 juvenile offenders.
- 15 x. Defendants admit that Rocking Arrow Boys Ranch was located in Kittitas
16 County, Washington. Defendants admit it was a facility licensed to accept
17 dependent youths in the care of DCYF.

18 5.19. Defendants admit they have a zero tolerance policy for all forms of sexual abuse
19 and sexual harassment of the children in their care. Defendants admit the remaining allegations
20 in paragraph 5.19.

21 5.20. The allegations in Paragraph 5.20, and its subparts, of Plaintiffs' Amended
22 Complaint contain legal arguments and legal conclusions to which no response is required. To
23 the extent the paragraph references the Prison Rape Elimination Act ("PREA"), 34 U.S.C. 30301
24 *et seq.*, those laws speak for themselves.

- 25 a. The allegations in this paragraph contain legal arguments and legal conclusions to
26 which no response is required. This paragraph cites 28 C.F.R. 115.6, which
27 speaks for itself.

- 1 b. 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 c. 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 d. The allegations in this paragraph contain legal arguments and legal conclusions to
8 which no response is required. This paragraph cites 28 C.F.R. 115.6, which
9 speaks for itself.
- 10 e. The allegations in this paragraph contain legal arguments and legal conclusions to
11 which no response is required. This paragraph cites 28 C.F.R. 115.6, which
12 speaks for itself.
- 13 f. The allegations in this paragraph contain legal arguments and legal conclusions to
14 which no response is required. This paragraph cites 28 C.F.R. 115.6, which
15 speaks for itself.
- 16 g. The allegations in this paragraph contain legal arguments and legal conclusions to
17 which no response is required. This paragraph cites 28 C.F.R. 115.6, which
18 speaks for itself.
- 19 h. The allegations in this paragraph contain legal arguments and legal conclusions to
20 which no response is required. This paragraph cites 28 C.F.R. 115.6, which
21 speaks for itself.

22 5.21. The allegations in Paragraph 5.21 of Plaintiffs' Amended Complaint contain legal
23 arguments and legal conclusions to which no response is required. To the extent the paragraph
24 references Defendants' policies applying PREA juvenile standards, those policies speak for
25 themselves.

26 5.22. The allegations in Paragraph 5.22 of Plaintiffs' Amended Complaint contain legal
27 arguments and legal conclusions to which no response is required. To the extent the paragraph

1 references Defendants' policies applying PREA juvenile standards, those policies speak for
2 themselves.

3 5.23. The allegations in Paragraph 5.23 of Plaintiffs' Amended Complaint contain legal
4 arguments and legal conclusions to which no response is required. To the extent the paragraph
5 references Defendants' policies applying PREA juvenile standards, those policies speak for
6 themselves.

7 5.24. Defendants admit Plaintiffs filed multiple public records requests seeking
8 documentation from the State of Washington. Defendants deny the remaining allegations of
9 paragraph 5.24.

10 5.25. Defendants deny the allegations in paragraph 5.25.

11 5.26. The allegations in Paragraph 5.26 of Plaintiffs' Amended Complaint contain legal
12 arguments and legal conclusions to which no response is required. To the extent the paragraph
13 references state laws and case law, those laws speak for themselves.

14 5.27. The allegations in Paragraph 5.27 of Plaintiffs' Amended Complaint contain legal
15 arguments and legal conclusions to which no response is required. To the extent the paragraph
16 references state laws, those laws speak for themselves.

17 5.28. Defendants deny the allegations in paragraph 5.28.

18 5.29. Defendants deny the allegations in paragraph 5.29.

19 5.30. Defendants deny the allegations in paragraph 5.30.

20 5.31. Defendants deny the allegations in paragraph 5.31.

21 5.32. Defendants deny the allegations in paragraph 5.32.

22 5.33. Defendants admit the existence of the March 29, 2019, incident report contained
23 in paragraph 5.33. That report speaks for itself. Defendants deny the remaining allegations in
24 paragraph 5.33.

25 5.34. Defendants deny the allegations in paragraph 5.34.

26 5.35. Defendants deny the allegations in paragraph 5.35.

1 5.36. Defendants admit that Robert Heath Fox was a guard at Echo Glen and pleaded
2 guilty in 2009 to first-degree custodial sexual misconduct. Defendants admit that an employee
3 of DSHS was quoted as referring to Fox as a “depraved individual.” Defendants deny the
4 remaining allegations in paragraph 5.36.

5 5.37. Defendants admit that Deanna Witters pleaded guilty to two counts of custodial
6 sexual misconduct. Defendants lack sufficient information to either admit or deny the words
7 Witters stated on the record in her testimony and therefore deny same. Defendants deny the
8 accuracy of the statements attributed to Witters in paragraph 5.37. Defendants deny the
9 remaining allegations in paragraph 5.37.

10 5.38. Defendants admit that Kalia Jandoc was charged with custodial sexual
11 misconduct in 2014. Defendants deny the remaining allegations in paragraph 5.38.

12 5.39. Defendants admit Mindi Stoker pleaded guilty to attempted assault and custodial
13 sexual misconduct. Defendants deny the remaining allegations in paragraph 5.39.

14 5.40. Defendants admit the allegations in paragraph 5.40.

15 5.41. Defendants admit Erin Stiebritz (née Snodgrass) pleaded guilty to custodial sexual
16 misconduct in 2016. Defendants deny the remaining allegations in paragraph 5.41.

17 5.42. Defendants lack sufficient information to either admit or deny the specific
18 statements attributed to Defendants in paragraph 5.42 and therefore deny the same.

19 5.43. Defendants lack sufficient information to either admit or deny the specific
20 statement attributed to John Clayton in paragraph 5.43 and therefore deny the same.

21 5.44. Defendants admit that a federal PREA audit of Green Hill School was completed
22 in 2019. That audit speaks for itself and Defendants neither admit nor deny the accuracy of the
23 information contained in the audit.

24 5.45. Paragraph 5.45 references the 2019 federal PREA audit of Green Hill School.
25 That audit speaks for itself and Defendants neither admit nor deny the accuracy of the
26 information contained in the audit.

1 5.46. Paragraph 5.46 references the 2019 federal PREA audit of Green Hill School.
2 That audit speaks for itself and Defendants neither admit nor deny the accuracy of the
3 information contained in the audit.

4 5.47. The allegations in Paragraph 5.47 of Plaintiffs' Amended Complaint contain legal
5 arguments and legal conclusions to which no response is required. To the extent the paragraph
6 references the 2019 PREA Audit of Green Hill School, that audit speaks for itself and
7 Defendants neither admit nor deny the accuracy of the information contained in the audit.

8 5.48. The allegations in Paragraph 5.47 of Plaintiffs' Amended Complaint contain legal
9 arguments and legal conclusions to which no response is required. To the extent the paragraph
10 references the 2019 PREA Audit of Green Hill School, that audit speaks for itself and
11 Defendants neither admit nor deny the accuracy of the information contained in the audit.

12 5.49. Defendants deny the allegations in paragraph 5.49.

13 5.50. Defendants admit Angel Misner was arrested for custodial sexual misconduct and
14 Emily Baker was arrested for abuse of office and tampering with a witness at Green Hill School.
15 The contents of any investigation documents referenced in paragraph 5.50 speak for themselves.
16 Defendants lack sufficient information to either admit or deny the specific statements attributed
17 to any investigation in paragraph 5.50 and therefore deny the same. Defendants admit an
18 employee was arrested in 2024 for selling methamphetamines and other contraband at Green Hill
19 School. Defendants deny the remaining allegations in paragraph 5.50.

20 5.51. Defendants admit Michelle Goodman was charged with custodial sexual
21 misconduct. The contents of any surveillance video held by law recovered by law enforcement
22 referenced in paragraph 5.51 speak for themselves. Defendants deny the remaining allegations
23 in paragraph 5.51.

24 5.52. Defendants admit that two Green Hill employees were arrested in 2024, one for
25 allegedly facilitating an attack on a youth and the other for allegedly possessing a controlled
26 substance in a correctional facility. Defendants deny the remaining allegations in paragraph
27 5.52.

1 5.53. Defendants admit that Dawn McLaughlin was arrested and charged with custodial
2 misconduct. The contents of any investigation documents referenced in paragraph 5.53 speak for
3 themselves. Defendants lack sufficient information to either admit or deny the specific
4 statements attributed to any investigation in paragraph 5.53 and therefore deny the same.
5 Defendants deny the remaining allegations in paragraph 5.53.

6 5.54. The contents of any investigation documents referenced in paragraph 5.54 speak
7 for themselves. Defendants lack sufficient information to either admit or deny the specific
8 statements attributed to any investigation in paragraph 5.54 and therefore deny the same.

9 5.55. Defendants admit that Michael Nolan was charged with five felonies involving
10 the sexual exploitation of a minor. Defendants deny the remaining allegations in paragraph 5.55.

11 5.56. The contents of the criminal and civil cases against Nolan speak for themselves.
12 Defendants lack sufficient information to either admit or deny the specific allegations in those
13 cases and therefore deny the same. Defendants deny the remaining allegations in paragraph
14 5.56.

15 5.57. Defendants admit that multiple criminal and civil lawsuits have been filed
16 involving claims of child sex abuse and harassment arising out of incidents alleged to have
17 occurred at Green Hill School, Echo Glen Children's Center, Maple Lane School, and Naselle
18 Youth Camp from the 1970s through the 2010s. Defendants deny the remaining allegations in
19 paragraph 5.57.

20 5.58. The allegations in Paragraph 5.58 of Plaintiffs' Amended Complaint contain legal
21 arguments and legal conclusions to which no response is required. Defendants deny the
22 remaining allegations in paragraph 5.58.

23 5.59. Defendants deny the allegations in paragraph 5.59.

24 5.60. Defendants deny the allegations in paragraph 5.60.

25 5.61. Defendants deny the allegations in paragraph 5.61.
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- 1 2. Defendants lack sufficient information to either admit or deny whether
2 Plaintiff A.A.2 resided at Echo Glen Children's Center and therefore deny
3 same. Defendants admit Plaintiff A.A.2 was a minor when he resided at
4 Green Hill School for periods of time in 1973-1975. Defendants lack
5 sufficient information to either admit or deny the current residence of Plaintiff
6 A.A.2 and therefore deny same. Defendants deny the remaining allegations in
7 paragraph 6.3.2.
- 8 3. Defendants admit Plaintiff A.D. was a minor when he resided at Echo Glen
9 Children's Center in 1990-1991. Defendants lack sufficient information to
10 either admit or deny the current residence of Plaintiff A.D. and therefore deny
11 same. Defendants deny the remaining allegations in paragraph 6.3.3.
- 12 4. Plaintiff A.H. has been dismissed from this lawsuit. Defendants deny the
13 allegations in paragraph 6.3.4.
- 14 5. Defendants admit Plaintiff A.H.2 was a minor when he resided at Echo Glen
15 Children's Center for periods of time in 2004-2005. Defendants lack
16 sufficient information to either admit or deny the current residence of Plaintiff
17 A.H.2 and therefore deny same. Defendants deny the remaining allegations in
18 paragraph 6.3.5.
- 19 6. Defendants admit Plaintiff A.H.3 resided at Maple Lane School in 2002.
20 Defendants lack sufficient information to either admit or deny the current
21 residence of Plaintiff A.H.3 and therefore deny same. Defendants deny the
22 remaining allegations in paragraph 6.3.6.
- 23 7. Defendants admit Plaintiff A.M. was a minor when he resided at Green Hill
24 School in 2004-2006. Defendants lack sufficient information to either admit
25
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1 or deny the current residence of Plaintiff A.M. and therefore deny
2 same. Defendants deny the remaining allegations in paragraph 6.3.7.

3 8. Defendants admit plaintiff A.N. was a minor when he resided at Maple Lane
4 School for periods of time in 2001-2002 and for periods of time in 2004.
5 Defendants admit Plaintiff A.N. continued to reside at Maple Lane School in
6 2005. Defendants lack sufficient information to either admit or deny the
7 current residence of Plaintiff A.N. and therefore deny same. Defendants deny
8 the remaining allegations in paragraph 6.3.8.

9
10 9. Defendants lack sufficient information to either admit or deny whether
11 Plaintiff A.P. resided at Green Hill School and therefore deny same.
12 Defendants lack sufficient information to either admit or deny the current
13 residence of Plaintiff A.P. and therefore deny same. Defendants deny the
14 remaining allegations in paragraph 6.3.9.

15 10. Defendants admit Plaintiff A.R. was a minor when he resided at Green Hill
16 School for periods of time in 1986-1987. Defendants admit Plaintiff
17 continued to reside at Green Hill School for periods of time in 1987-1988.
18 Defendants lack sufficient information to either admit or deny the current
19 residence of Plaintiff A.R. and therefore deny same. Defendants deny the
20 remaining allegations in paragraph 6.3.10.

21
22 11. Defendants admit Plaintiff A.R.2 was a minor when he resided at Maple Lane
23 School in 1986-1987. Defendants lack sufficient information to either admit
24 or deny the current residence of Plaintiff A.R.2 and therefore deny
25 same. Defendants deny the remaining allegations in paragraph 6.3.11.
26
27

12. Defendants admit Plaintiff A.S. was a minor when she resided at Echo Glen Children's Center for periods of time in 1998-1999. Defendants admit Plaintiff A.S. continued to reside at Echo Glen Children's Center for periods of time in 1999-2001. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff A.S. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.12.

13. Defendants admit Plaintiff A.S.2 was a minor when he resided at Mission Creek Youth Camp in 1988. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff A.S.2 and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.13.

14. Defendants admit Plaintiff A.W. was a minor when he resided at Indian Ridge Youth Camp in 1998. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff A.W. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.14.

15. Defendants admit Plaintiff B.B. was a minor when she resided at Echo Glen Children's Center in 2006-2007. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff B.B. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.15.

16. Defendants admit Plaintiff B.D. resided at Maple Lane School in 2010. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff B.D. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.16.

17. Defendants admit Plaintiff B.F. was a minor when she resided at Echo Glen Children's Center in 2000-2001. Defendants lack sufficient information to

1 either admit or deny the current residence of Plaintiff B.F. and therefore deny
2 same. Defendants deny the remaining allegations in paragraph 6.3.17.

3
4 18. Defendants admit Plaintiff B.F.2. was a minor when he resided at Maple Lane
5 School in 1996-1997. Defendants lack sufficient information to either admit
6 or deny the current residence of Plaintiff B.F.2 and therefore deny
7 same. Defendants deny the remaining allegations in paragraph 6.3.18.

8 19. Defendants admit Plaintiff B.O. was a minor when he resided at Green Hill
9 School in 2014-2015. Defendants admit Plaintiff B.O. resided again at Green
10 Hill School in 2017-2018. Defendants lack sufficient information to either
11 admit or deny the current residence of Plaintiff B.O. and therefore deny
12 same. Defendants deny the remaining allegations in paragraph 6.3.19.

13 20. Defendants admit Plaintiff B.S. was a minor when he resided at Naselle Youth
14 Camp for periods of time in 1986-1989. Defendants lack sufficient
15 information to either admit or deny the current residence of Plaintiff B.S. and
16 therefore deny same. Defendants deny the remaining allegations in paragraph
17 6.3.20.

18
19 21. Defendants admit Plaintiff B.S.2 was a minor when he resided at Maple Lane
20 School for periods of time in 2001-2003. Defendants admit Plaintiff B.S.2
21 continued to reside at Mapel Lane School in 2003-2004. Defendants lack
22 sufficient information to either admit or deny the current residence of Plaintiff
23 B.S.2 and therefore deny same. Defendants deny the remaining allegations in
24 paragraph 6.3.21.

25 22. Defendants admit Plaintiff B.S.3 was a minor when he resided at Naselle
26 Youth Camp in 1991. Defendants lack sufficient information to either admit
27

1 or deny the current residence of Plaintiff B.S.3 and therefore deny
2 same. Defendants deny the remaining allegations in paragraph 6.3.22.

3 23. Defendants admit Plaintiff C.B. was a minor when he resided at Echo Glen
4 Children's Center in 1999-2000. Defendants admit Plaintiff C.B. was a minor
5 when he resided at Green Hill School for periods of time in 2000-2002.
6 Defendants admit Plaintiff C.B. continued to reside at Green Hill School for
7 periods of time in 2002-2005. Defendants lack sufficient information to either
8 admit or deny the current residence of Plaintiff C.B. and therefore deny
9 same. Defendants deny the remaining allegations in paragraph 6.3.23.

10
11 24. Defendants admit Plaintiff C.B.2 was a minor when he resided at Green Hill
12 School in 1992-1993. Defendants lack sufficient information to either admit
13 or deny the current residence of Plaintiff C.B.2 and therefore deny
14 same. Defendants deny the remaining allegations in paragraph 6.3.24.

15 25. Defendants admit Plaintiff C.B.3 was a minor when he resided at Echo Glen
16 Children's Center in 2000-2001. Defendants lack sufficient information to
17 either admit or deny the current residence of Plaintiff C.B.3 and therefore
18 deny same. Defendants deny the remaining allegations in paragraph 6.3.25.

19
20 26. Defendants admit Plaintiff C.C. was a minor when he resided at Naselle
21 Youth Camp in 1990-1991. Defendants admit Plaintiff C.C. was a minor
22 when he resided at Green Hill School for periods of time in 1992-1993.
23 Defendants lack sufficient information to either admit or deny the current
24 residence of Plaintiff C.C. and therefore deny same. Defendants deny the
25 remaining allegations in paragraph 6.3.26.

1 27. Defendants admit Plaintiff C.C.2 was a minor when he resided at Naselle
2 Youth Camp for periods of time in 2010-2011. Defendants lack sufficient
3 information to either admit or deny the current residence of Plaintiff C.C.2
4 and therefore deny same. Defendants deny the remaining allegations in
5 paragraph 6.3.27.

6 28. Defendants admit Plaintiff C.G. was a minor when he resided at Green Hill
7 School in 1993-1994. Defendants admit Plaintiff C.G. was a minor when he
8 resided at Cascade Center for periods of time in 1994. Defendants admit
9 Plaintiff C.B. continued to reside at Cascade Center in 1994-1995.
10 Defendants lack sufficient information to either admit or deny the current
11 residence of Plaintiff C.G. and therefore deny same. Defendants deny the
12 remaining allegations in paragraph 6.3.28.

13 29. Defendants admit Plaintiff C.M. was a minor when he resided at Naselle
14 Youth Camp for periods of time in 1983-1985. Defendants lack sufficient
15 information to either admit or deny the current residence of Plaintiff C.M. and
16 therefore deny same. Defendants deny the remaining allegations in paragraph
17 6.3.29.

18 30. Defendants admit Plaintiff C.M.2 was a minor when he resided at Naselle
19 Youth Camp in 2018-2019. Defendants lack sufficient information to either
20 admit or deny the current residence of Plaintiff C.M. and therefore deny
21 same. Defendants deny the remaining allegations in paragraph 6.3.30.

22 31. Defendants admit Plaintiff C.R. was a minor when he resided at Green Hill
23 School for periods of time in 1993-1994, and 1996. Defendants lack
24 sufficient information to either admit or deny the current residence of Plaintiff
25
26
27

1 C.R. and therefore deny same. Defendants deny the remaining allegations in
2 paragraph 6.3.31.

3 32. Defendants admit Plaintiff C.R.2 was a minor when he resided at Naselle
4 Youth Camp in 2002-2003. Defendants lack sufficient information to either
5 admit or deny the current residence of Plaintiff C.R.2 and therefore deny
6 same. Defendants deny the remaining allegations in paragraph 6.3.32.

7
8 33. Defendants admit Plaintiff C.R.3 was a minor when he resided at Naselle
9 Youth Camp in 2015. Defendants lack sufficient information to either admit
10 or deny the current residence of Plaintiff C.R.3 and therefore deny
11 same. Defendants deny the remaining allegations in paragraph 6.3.33.

12 34. Defendants lack sufficient information to either admit or deny whether
13 Plaintiff C.R.4 resided at Maple Lane School and therefore deny same.
14 Defendants lack sufficient information to either admit or deny the current
15 residence of Plaintiff C.R.4 and therefore deny same. Defendants deny the
16 remaining allegations in paragraph 6.3.34.

17
18 35. Defendants admit Plaintiff C.S. was a minor when he resided at Maple Lane
19 School in 1979-1980. Defendants lack sufficient information to either admit
20 or deny the current residence of Plaintiff C.S. and therefore deny
21 same. Defendants deny the remaining allegations in paragraph 6.3.35.

22 36. Defendants admit Plaintiff C.S.2 was a minor when he resided at Echo Glen
23 Children's Center in 1997-1998. Defendants lack sufficient information to
24 either admit or deny the current residence of Plaintiff C.S.2 and therefore deny
25 same. Defendants deny the remaining allegations in paragraph 6.3.36.
26
27

1 37. Defendants admit Plaintiff C.S.3 was a minor when he resided at Naselle
2 Youth Camp in 2001-2002. Defendants lack sufficient information to either
3 admit or deny the current residence of Plaintiff C.S.3 and therefore deny
4 same. Defendants deny the remaining allegations in paragraph 6.3.37.

5 38. Defendants admit Plaintiff D.B. was a minor when he resided at Naselle
6 Youth Camp for periods of time in 1988-1989. Defendants admit Plaintiff
7 D.B. was a minor when he resided at Green Hill School for periods of time in
8 1990-1992. Defendants admit Plaintiff D.B. continued to reside at Green Hill
9 School for periods of time in 1992-1993. Defendants lack sufficient
10 information to either admit or deny the current residence of Plaintiff D.B. and
11 therefore deny same. Defendants deny the remaining allegations in paragraph
12 6.3.38.

13
14 39. Defendants admit Plaintiff D.C. was a minor when she resided at Camp
15 Outlook in 2012. Defendants lack sufficient information to either admit or
16 deny the current residence of Plaintiff D.C. and therefore deny
17 same. Defendants deny the remaining allegations in paragraph 6.3.39.

18 40. Defendants lack sufficient information to either admit or deny whether
19 Plaintiff D.D. resided at Echo Glen Children's Center and therefore deny
20 same. Defendants lack sufficient information to either admit or deny the
21 current residence of Plaintiff D.D. and therefore deny same. Defendants deny
22 the remaining allegations in paragraph 6.3.40.

23
24 41. Defendants admit Plaintiff D.G. was a minor when she resided at Naselle
25 Youth Camp in 1998-1999. Defendants lack sufficient information to either
26 admit or deny the current residence of Plaintiff D.G. and therefore deny
27 same. Defendants deny the remaining allegations in paragraph 6.3.41.

1 42. Defendants lack sufficient information to either admit or deny whether
2 Plaintiff D.G.2 resided at Cascadia Juvenile Reception and Diagnostic Center
3 therefore deny same. Defendants lack sufficient information to either admit or
4 deny the current residence of Plaintiff D.G.2 and therefore deny
5 same. Defendants deny the remaining allegations in paragraph 6.3.42.

6 43. Defendants admit Plaintiff D.H. was a minor when he resided at Echo Glen
7 Children's Center for periods of time in 2003-2004. Defendants admit
8 Plaintiff D.H. continued to reside at Echo Glen Children's Center for periods
9 of time in 2004-2006. Defendants lack sufficient information to either admit
10 or deny the current residence of Plaintiff D.H. and therefore deny
11 same. Defendants deny the remaining allegations in paragraph 6.3.43.

12 44. Defendants lack sufficient information to either admit or deny whether
13 Plaintiff D.L. resided at Echo Glen Children's Center and therefore deny
14 same. Defendants lack sufficient information to either admit or deny the
15 current residence of Plaintiff D.L. and therefore deny same. Defendants deny
16 the remaining allegations in paragraph 6.3.44.

17 45. Defendants admit Plaintiff D.M. was a minor when he resided at Maple Lane
18 School in 2005-2006. Defendants lack sufficient information to either admit
19 or deny the current residence of Plaintiff D.M. and therefore deny
20 same. Defendants deny the remaining allegations in paragraph 6.3.45.

21 46. Defendants lack sufficient information to either admit or deny whether
22 Plaintiff D.N. resided at Echo Glen Children's Center and therefore deny
23 same. Defendants lack sufficient information to either admit or deny the
24 current residence of Plaintiff D.N. and therefore deny same. Defendants deny
25 the remaining allegations in paragraph 6.3.46.
26
27

1 47. Defendants admit Plaintiff D.R. was a minor when he resided at Green Hill
2 School in 2009-2010. Defendants lack sufficient information to either admit
3 or deny the current residence of Plaintiff D.R. and therefore deny
4 same. Defendants deny the remaining allegations in paragraph 6.3.47.

5 48. Defendants admit Plaintiff D.S. was a minor when he resided at Naselle Youth
6 Camp for periods of time in 2012-2015. Defendants lack sufficient
7 information to either admit or deny the current residence of Plaintiff D.S. and
8 therefore deny same. Defendants deny the remaining allegations in paragraph
9 6.3.48.

10
11 49. Defendants admit Plaintiff D.S.2 was a minor when he resided at Indian Ridge
12 Youth Camp for periods of time in 1996-1997. Defendants admit Plaintiff
13 was a minor when he resided at Diamond Home in 1997. Defendants lack
14 sufficient information to either admit or deny the current residence of Plaintiff
15 D.S.2 and therefore deny same. Defendants deny the remaining allegations in
16 paragraph 6.3.49.

17
18 50. Defendants admit Plaintiff D.T. was a minor when he resided at Maple Lane
19 School for periods of time in 2006. Defendants admit Plaintiff D.T. continued
20 to reside at Maple Lane School in 2006-2008. Defendants lack sufficient
21 information to either admit or deny the current residence of Plaintiff D.T. and
22 therefore deny same. Defendants deny the remaining allegations in paragraph
23 6.3.50.

24 51. Defendants admit Plaintiff D.T.2 was a minor when he resided at Naselle
25 Youth Camp in 1996-1997. Defendants lack sufficient information to either
26 admit or deny the current residence of Plaintiff D.T.2 and therefore deny
27 same. Defendants deny the remaining allegations in paragraph 6.3.51.

1 52. Defendants admit Plaintiff E.B. was a minor when he resided at Naselle Youth
2 Camp for periods of time in 1994. Defendants lack sufficient information to
3 either admit or deny the current residence of Plaintiff E.B. and therefore deny
4 same. Defendants deny the remaining allegations in paragraph 6.3.52.

5 53. Defendants admit Plaintiff E.G. was a minor when he resided at Echo Glen
6 Children's Center for periods of time in 2000-2001. Defendants admit
7 Plaintiff E.G. was a minor when he resided at Maple Lane School for periods
8 of time in 2002-2004. Defendants lack sufficient information to either admit
9 or deny whether Plaintiff E.G. resided at Child Study and Treatment Center,
10 Seattle Children's Hospital, or Durango Street Group Home and therefore
11 deny same. Defendants lack sufficient information to either admit or deny the
12 current residence of Plaintiff E.G. and therefore deny same. Defendants deny
13 the remaining allegations in paragraph 6.3.53.

14
15 54. Defendants lack sufficient information to either admit or deny whether
16 Plaintiff G.A. resided at Echo Glen Children's Center and therefore deny
17 same. Defendants lack sufficient information to either admit or deny the
18 current residence of Plaintiff G.A. and therefore deny same. Defendants deny
19 the remaining allegations in paragraph 6.3.54.

20 55. Defendants lack sufficient information to either admit or deny whether
21 Plaintiff G.E. resided at Green Hill School and therefore deny same.
22 Defendants lack sufficient information to either admit or deny the current
23 residence of Plaintiff G.E. and therefore deny same. Defendants deny the
24 remaining allegations in paragraph 6.3.55.

25
26 56. Defendants admit Plaintiff G.G. was a minor when he resided at Maple Lane
27 School for periods of time in 1996-1998. Defendants admit Plaintiff G.G. was

1 a minor when he resided at Parke Creek Community Facility in 1999.
2 Defendants lack sufficient information to either admit or deny the current
3 residence of Plaintiff G.G. and therefore deny same. Defendants deny the
4 remaining allegations in paragraph 6.3.56.

5 57. Defendants lack sufficient information to either admit or deny whether
6 Plaintiff G.M. resided at Naselle Youth Camp and therefore deny same.
7 Defendants lack sufficient information to either admit or deny the current
8 residence of Plaintiff G.M. and therefore deny same. Defendants deny the
9 remaining allegations in paragraph 6.3.57.

10
11 58. Defendants admit Plaintiff G.P. was a minor when he resided at Naselle Youth
12 Camp in 2018-2019. Defendants lack sufficient information to either admit
13 or deny the current residence of Plaintiff G.P. and therefore deny
14 same. Defendants deny the remaining allegations in paragraph 6.3.58.

15 59. Defendants lack sufficient information to either admit or deny whether
16 Plaintiff G.T. resided at Naselle Youth Camp or Green Hill School and
17 therefore deny same. Defendants lack sufficient information to either admit or
18 deny the current residence of Plaintiff G.T. and therefore deny
19 same. Defendants deny the remaining allegations in paragraph 6.3.59.

20
21 60. Defendants admit Plaintiff G.T.2 was a minor when he resided at Naselle
22 Youth Camp in 1997-1998. Defendants lack sufficient information to either
23 admit or deny the current residence of Plaintiff G.T.2 and therefore deny
24 same. Defendants deny the remaining allegations in paragraph 6.3.60.

25 61. Defendants admit Plaintiff H.D. was a minor when she resided at Echo Glen
26 Children's Center for periods of time in 2001-2002. Defendants lack
27

1 sufficient information to either admit or deny the current residence of Plaintiff
2 H.D. and therefore deny same. Defendants deny the remaining allegations in
3 paragraph 6.3.61.

4
5 62. Defendants admit Plaintiff H.H. was a minor when he resided at Echo Glen
6 Children's Center in 1981. Defendants lack sufficient information to either
7 admit or deny the current residence of Plaintiff H.H. and therefore deny
8 same. Defendants deny the remaining allegations in paragraph 6.3.62.

9
10 63. Defendants admit Plaintiff I.S. was a minor when he resided at Green Hill
11 School in 2010. Defendants lack sufficient information to either admit or
12 deny the current residence of Plaintiff I.S. and therefore deny
13 same. Defendants deny the remaining allegations in paragraph 6.3.63.

14
15 64. Defendants lack sufficient information to either admit or deny whether
16 Plaintiff J.A. resided at Maple Lane School and therefore deny same.
17 Defendants lack sufficient information to either admit or deny the current
18 residence of Plaintiff J.A. and therefore deny same. Defendants deny the
19 remaining allegations in paragraph 6.3.64.

20
21 65. Defendants admit Plaintiff J.A.2 was a minor when he resided at Echo Glen
22 for periods of time in 1989-1991. Defendants admit Plaintiff J.A.2 was a
23 minor when he resided at Naselle Youth Camp in 1992-1993. Defendants
24 admit Plaintiff J.A.2 was a minor when he resided at Maple Lane School for
25 periods of time in 1994 and 1995. Defendants lack sufficient information to
26 either admit or deny the current residence of Plaintiff J.A.2 and therefore deny
27 same. Defendants deny the remaining allegations in paragraph 6.3.65.

1 66. Defendants admit Plaintiff J.B. was a minor when he resided at Green Hill
2 School for periods of time in 1994-1995. Defendants admit Plaintiff J.B.
3 continued to reside at Green Hill School in 1995-1997. Defendants lack
4 sufficient information to either admit or deny the current residence of Plaintiff
5 J.B. and therefore deny same. Defendants deny the remaining allegations in
6 paragraph 6.3.66.

7
8 67. Defendants admit Plaintiff J.B.2 was a minor when he resided at Echo Glen
9 Children's Center for periods of time in 2001 and 2002. Defendants lack
10 sufficient information to either admit or deny the current residence of Plaintiff
11 J.B.2 and therefore deny same. Defendants deny the remaining allegations in
12 paragraph 6.3.67.

13 68. Defendants admit Plaintiff J.C. resided at Green Hill School in 1996.
14 Defendants lack sufficient information to either admit or deny the current
15 residence of Plaintiff J.C. and therefore deny same. Defendants deny the
16 remaining allegations in paragraph 6.3.68.

17
18 69. Defendants admit Plaintiff J.C.2 was a minor when he resided at Maple Lane
19 School for periods of time in 1997-1999. Defendants lack sufficient
20 information to either admit or deny the current residence of Plaintiff J.C.2 and
21 therefore deny same. Defendants deny the remaining allegations in paragraph
22 6.3.69.

23 70. Defendants admit Plaintiff J.C.3 was a minor when he resided at Naselle
24 Youth Camp in 1993. Defendants lack sufficient information to either admit
25 or deny the current residence of Plaintiff J.C.3 and therefore deny
26 same. Defendants deny the remaining allegations in paragraph 6.3.70.
27

1 71. Defendants admit Plaintiff J.C.4 was a minor when he resided at Naselle
2 Youth Camp for periods of time in 1991 and 1992. Defendants lack sufficient
3 information to either admit or deny the current residence of Plaintiff J.C.4 and
4 therefore deny same. Defendants deny the remaining allegations in paragraph
5 6.3.71.

6 72. Defendants admit Plaintiff J.C.5 was a minor when he resided at Camp
7 Outlook Staging at Indian Creek for a period of time in 1999. Defendants
8 admit Plaintiff J.C.5 resided at Camp Outlook for a period of time in 1999-
9 2000. Defendants lack sufficient information to either admit or deny the
10 current residence of Plaintiff J.C.5 and therefore deny same. Defendants deny
11 the remaining allegations in paragraph 6.3.72.

12 73. Defendants admit Plaintiff J.D. was a minor when he resided at Maple Lane
13 School for a period of time in 2008. Defendants admit Plaintiff J.D. continued
14 to reside at Maple Lane School for periods of time in 2008-2010. Defendants
15 admit Plaintiff J.D. resided at Green Hill School for periods of time in 2010-
16 2011. Defendants lack sufficient information to either admit or deny the
17 current residence of Plaintiff J.D. and therefore deny same. Defendants deny
18 the remaining allegations in paragraph 6.3.73.

19 74. Defendants admit Plaintiff J.D.2 was a minor when he resided at Green Hill
20 School for periods of time in 2005. Defendants lack sufficient information to
21 either admit or deny the current residence of Plaintiff J.D.2 and therefore deny
22 same. Defendants deny the remaining allegations in paragraph 6.3.74.

23 75. Defendants admit Plaintiff J.D.3 was a minor when she resided at Echo Glen
24 Children's Center for periods of time in 1999 and 2000. Defendants lack
25 sufficient information to either admit or deny the current residence of Plaintiff
26
27

J.D.3 and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.75.

76. Plaintiff J.E. has been dismissed from this lawsuit. Defendants deny the allegations in paragraph 6.3.76.

77. Defendants admit Plaintiff J.E.2 was a minor when he resided at Camp Outlook Staging at Indian Ridge for a period of time in 1999-2000. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff J.E.2 and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.77.

78. Defendants admit Plaintiff J.F. was a minor when he resided at Green Hill School for a period of time in 2010. Defendants admit Plaintiff J.F. continued to reside at Green Hill School in 2010. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff J.F. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.78.

79. Defendants lack sufficient information to either admit or deny whether Plaintiff J.F.2 resided at Naselle Youth Camp and therefore deny same. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff J.F.2 and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.79.

80. Defendants admit Plaintiff J.F.3 was a minor when he resided at Echo Glen Children's Center in 1988. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff J.F.3 and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.80.

1 81. Defendants admit Plaintiff J.F.4 was a minor when he resided at Indian Ridge
2 Youth Camp for periods of time in 1997. Defendants lack sufficient
3 information to either admit or deny the current residence of Plaintiff J.F.4 and
4 therefore deny same. Defendants deny the remaining allegations in paragraph
5 6.3.81.

6 82. Defendants admit Plaintiff J.G. was a minor when he resided at Green Hill
7 School in 1991. Defendants lack sufficient information to either admit or
8 deny the current residence of Plaintiff J.G. and therefore deny
9 same. Defendants deny the remaining allegations in paragraph 6.3.82.
10

11 83. Defendants admit Plaintiff J.H. was a minor when he resided at Green Hill
12 School for a period of time in 2011-2012. Defendants admit Plaintiff J.H.
13 resided at Green Hill School again for periods of time in 2014-2015.
14 Defendants lack sufficient information to either admit or deny the current
15 residence of Plaintiff J.H. and therefore deny same. Defendants deny the
16 remaining allegations in paragraph 6.3.83.

17 84. Defendants admit Plaintiff J.H.2 was a minor when he resided at Green Hill
18 School for periods of time in 1999-2001. Defendants admit Plaintiff J.H.
19 resided at Green Hill School again in 2002. Defendants lack sufficient
20 information to either admit or deny the current residence of Plaintiff J.H.2 and
21 therefore deny same. Defendants deny the remaining allegations in paragraph
22 6.3.84.
23

24 85. Defendants admit Plaintiff J.H.3 was a minor when he resided at Echo Glen
25 Children's Center for periods of time in 1996 and 1997. Defendants admit
26 Plaintiff J.H.3 was a minor when he resided at Green Hill School for periods
27 of time in 1997-1998. Defendants lack sufficient information to either admit

1 or deny the current residence of Plaintiff J.H.3 and therefore deny
2 same. Defendants deny the remaining allegations in paragraph 6.3.85.

3
4 86. Defendants admit Plaintiff J.H.4 was a minor when he resided at Echo Glen
5 Children's Center in 2011-2012. Defendants lack sufficient information to
6 either admit or deny the current residence of Plaintiff J.H.4 and therefore deny
7 same. Defendants deny the remaining allegations in paragraph 6.3.86.

8 87. Defendants lack sufficient information to either admit or deny whether
9 Plaintiff J.J. resided at Echo Glen Children's Center and therefore deny same.
10 Defendants lack sufficient information to either admit or deny the current
11 residence of Plaintiff J.J. and therefore deny same. Defendants deny the
12 remaining allegations in paragraph 6.3.87.

13 88. Defendants admit Plaintiff J.K. was a minor when he resided at Green Hill
14 School for periods of time in 2005-2006. Defendants admit Plaintiff J.K. was
15 a minor when he resided at Maple Lane School for periods of time in 2008.
16 Defendants admit Plaintiff J.K. continued to reside at Maple Lane School for
17 periods of time in 2008-2009. Defendants lack sufficient information to either
18 admit or deny the current residence of Plaintiff J.K. and therefore deny
19 same. Defendants deny the remaining allegations in paragraph 6.3.88.

20
21 89. Defendants lack sufficient information to either admit or deny whether
22 Plaintiff J.L. resided at Maple Lane School and therefore deny same.
23 Defendants lack sufficient information to either admit or deny the current
24 residence of Plaintiff J.L. and therefore deny same. Defendants deny the
25 remaining allegations in paragraph 6.3.89.
26
27

1 90. Defendants admit Plaintiff J.L.2 was a minor when he resided at Naselle
2 Youth Camp for periods of time in 1990 and 1991. Defendants lack sufficient
3 information to either admit or deny the current residence of Plaintiff J.L.2 and
4 therefore deny same. Defendants deny the remaining allegations in paragraph
5 6.3.90.

6 91. Defendants admit Plaintiff J.L.3 was a minor when he resided at Maple Lane
7 School for periods of time in 1997 and 1999-2000. Defendants admit Plaintiff
8 J.L.3 resided at Maple Lane School in 2001. Defendants lack sufficient
9 information to either admit or deny the current residence of Plaintiff J.L.3 and
10 therefore deny same. Defendants deny the remaining allegations in paragraph
11 6.3.91.

12 92. Defendants lack sufficient information to either admit or deny whether
13 Plaintiff J.M. resided at Naselle Youth Camp and therefore deny same and
14 therefore deny same. Defendants lack sufficient information to either admit or
15 deny the current residence of Plaintiff J.M. and therefore deny
16 same. Defendants deny the remaining allegations in paragraph 6.3.92.

17 93. Defendants lack sufficient information to either admit or deny whether
18 Plaintiff J.S. resided at Rocking Arrow Boys Home or a youth center near
19 Garfield High School in Seattle, Washington and therefore deny same.
20 Defendants lack sufficient information to either admit or deny the current
21 residence of Plaintiff J.S. and therefore deny same. Defendants deny the
22 remaining allegations in paragraph 6.3.93.

23 94. Defendants admit Plaintiff J.T. was a minor when he resided at Twin Rivers
24 Community Facility in 2003. Defendants lack sufficient information to either
25
26
27

admit or deny the current residence of Plaintiff J.T. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.94.

95. Defendants admit Plaintiff J.T.2 was a minor when he resided at Green Hill School for a period of time in 1991-1992. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff J.T.2 and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.95.

96. Defendants admit Plaintiff J.T.3 was a minor when he resided at Naselle Youth Camp for periods of time in 2000 and 2001. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff J.T.3 and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.96.

97. Defendants admit Plaintiff J.V. was a minor when he resided at Echo Glen Children's Center for periods of time in 2005-2007. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff J.V. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.97.

98. Defendants admit Plaintiff J.W. was a minor when he resided at Echo Glen Children's Center for a period of time in 1987-1988. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff J.W. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.98.

99. Defendants lack sufficient information to either admit or deny whether Plaintiff J.Y. resided at Green Hill School and therefore deny same.

Defendants lack sufficient information to either admit or deny the current residence of Plaintiff J.Y. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.99.

100. Defendants lack sufficient information to either admit or deny whether Plaintiff K.A. resided at Echo Glen Children's Center and therefore deny same. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff K.A. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.100.

101. Defendants lack sufficient information to either admit or deny whether Plaintiff K.C. resided at Echo Glen Children's Center and therefore deny same. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff K.C. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.101.

102. Defendants lack sufficient information to either admit or deny whether Plaintiff K.D. resided at Naselle Youth Camp and therefore deny same. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff K.D. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.102.

103. Defendants admit Plaintiff K.E. was a minor when he resided at Maple Lane School for periods of time in 1994 and 1995-1996. Defendants admit Plaintiff K.E. resided at Touchstone Community Facility for a period of time in 1997-1998. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff K.E. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.103.

104. Defendants admit Plaintiff K.F. was a minor when she resided at Echo Glen Children's Center for periods of time in 1986 and 1988. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff K.F. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.104.

105. Defendants admit Plaintiff K.M. was a minor when he resided at Green Hill School for periods of time in 2003 and 2004. Defendants admit Plaintiff K.M. continued to reside at Green Hill School in 2004-2005. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff K.M. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.105.

106. Defendants lack sufficient information to either admit or deny whether Plaintiff K.T. resided at Echo Glen Children's Center or Naselle Youth Camp and therefore deny same. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff K.T. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.106.

107. Defendants lack sufficient information to either admit or deny whether Plaintiff L.B. resided at Maple Lane School and therefore deny same. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff L.B. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.107.

108. Defendants admit Plaintiff L.B.2 was a minor when he resided at Naselle Youth Camp for periods of time in 1988 and 1989. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff L.B.2 and

therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.108.

109. Defendants admit Plaintiff L.B.3 was a minor when she resided at Naselle Youth Camp for periods of time in 2003. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff L.B.3 and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.109.

110. Defendants admit Plaintiff L.H. was a minor when she resided at Echo Glen Children's Center in 1998. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff L.H. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.110.

111. Defendants lack sufficient information to either admit or deny whether Plaintiff L.H.2 resided at Echo Glen Children's Center and therefore deny same. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff L.H.2 and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.111.

112. Defendants lack sufficient information to either admit or deny whether Plaintiff L.K. resided at Echo Glen Children's Center and therefore deny same. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff L.K. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.112.

113. Defendants admit Plaintiff L.M. was a minor when he resided at Mission Creek Youth Camp in 1993-1994. Defendants lack sufficient information to

1 either admit or deny the current residence of Plaintiff L.M. and therefore deny
2 same. Defendants deny the remaining allegations in paragraph 6.3.113.

3 114. Defendants admit Plaintiff L.S. was a minor when he resided at Green Hill
4 School for a period of time in 2009. Defendants admit Plaintiff L.S.
5 continued to reside at Green Hill School for periods of time in 2009-2012.
6 Defendants lack sufficient information to either admit or deny the current
7 residence of Plaintiff L.S. and therefore deny same. Defendants deny the
8 remaining allegations in paragraph 6.3.114.

9
10 115. Defendants admit Plaintiff L.T. was a minor when he resided at Echo Glen
11 Children's Center for periods of time in 1992 and 1994. Defendants admit
12 Plaintiff L.T. was a minor when he resided at Green Hill School for periods of
13 time in 1995. Defendants admit Plaintiff L.T. resided at Green Hill School
14 again for periods of time in 1996-1997. Defendants lack sufficient
15 information to either admit or deny the current residence of Plaintiff L.T. and
16 therefore deny same. Defendants deny the remaining allegations in paragraph
17 6.3.115.

18
19 116. Defendants admit Plaintiff L.W. was a minor when he resided at Green
20 Hill School in 1998 and 1999. Defendants admit Plaintiff L.T. resided at
21 Green Hill School again for periods of time in 2000. Defendants lack
22 sufficient information to either admit or deny the current residence of Plaintiff
23 L.W. and therefore deny same. Defendants deny the remaining allegations in
24 paragraph 6.3.116.

25 117. Defendants admit Plaintiff M.A. was a minor when she resided at Echo
26 Glen Children's Center for periods of time in 2001 and 2002. Defendants lack
27 sufficient information to either admit or deny the current residence of Plaintiff

1 M.A. and therefore deny same. Defendants deny the remaining allegations in
2 paragraph 6.3.117.

3 118. Defendants admit Plaintiff M.B. was a minor when he resided at Maple
4 Lane School in 2001-2002. Defendants admit Plaintiff M.B. resided at Maple
5 Lane School again for a period of time in 2003. Defendants lack sufficient
6 information to either admit or deny the current residence of Plaintiff M.B. and
7 therefore deny same. Defendants deny the remaining allegations in paragraph
8 6.3.118.

9
10 119. Defendants lack sufficient information to either admit or deny whether
11 Plaintiff M.C. resided at Mission Creek Youth Camp and therefore deny same.
12 Defendants lack sufficient information to either admit or deny the current
13 residence of Plaintiff M.C. and therefore deny same. Defendants deny the
14 remaining allegations in paragraph 6.3.119.

15 120. Defendants admit Plaintiff M.D. resided at Naselle Youth Camp in 2005-
16 2006. Defendants lack sufficient information to either admit or deny the
17 current residence of Plaintiff M.D. and therefore deny same. Defendants deny
18 the remaining allegations in paragraph 6.3.120.

19
20 121. Defendants admit Plaintiff M.D.2 was a minor when he resided at Mission
21 Creek Youth Camp in 1988. Defendants lack sufficient information to either
22 admit or deny the current residence of Plaintiff M.D.2 and therefore deny
23 same. Defendants deny the remaining allegations in paragraph 6.3.121.

24 122. Defendants admit Plaintiff M.E. was a minor when he resided at Indian
25 Ridge Youth Camp in 1998. Defendants lack sufficient information to either
26

admit or deny the current residence of Plaintiff M.E. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.122.

123. Defendants admit Plaintiff M.F. was a minor when she resided at Echo Glen Children's Center for periods of time in 2007 and 2008. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff M.F. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.123.

124. Defendants lack sufficient information to either admit or deny whether Plaintiff M.H. resided at Sunrise Community Facility and therefore deny same. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff M.H. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.124.

125. Defendants lack sufficient information to either admit or deny whether Plaintiff M.H.2 resided at Green Hill School and therefore deny same. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff M.H.2 and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.125.

126. Defendants admit Plaintiff M.H.3 was a minor when he resided at Maple Lane School in 1995-1996. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff M.H.3. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.126.

127. Defendants lack sufficient information to either admit or deny whether Plaintiff M.J. resided at Cascadia Juvenile Reception and Diagnostic Center or Cedar Creek Youth Camp and therefore deny same. Defendants lack

1 sufficient information to either admit or deny the current residence of Plaintiff
2 M.J. and therefore deny same. Defendants deny the remaining allegations in
3 paragraph 6.3.127.

4
5 128. Defendants lack sufficient information to either admit or deny whether
6 Plaintiff M.M. resided at Okanogan Juvenile Detention Center and therefore
7 deny same. Defendants lack sufficient information to either admit or deny the
8 current residence of Plaintiff M.M. and therefore deny same. Defendants
9 deny the remaining allegations in paragraph 6.3.128.

10 129. Defendants admit Plaintiff M.N. was a minor when he resided at Parke
11 Creek Community Facility in 1993. Defendants lack sufficient information to
12 either admit or deny the current residence of Plaintiff M.N. and therefore deny
13 same. Defendants deny the remaining allegations in paragraph 6.3.129.

14 130. Defendants lack sufficient information to either admit or deny whether
15 Plaintiff M.O. resided at Echo Glen Children's Center or Green Hill School
16 and therefore deny same. Defendants lack sufficient information to either
17 admit or deny the current residence of Plaintiff M.O. and therefore deny
18 same. Defendants deny the remaining allegations in paragraph 6.3.130.

19
20 131. Defendants admit Plaintiff M.O.2 was a minor when she resided at Echo
21 Glen Children's Center in 1998 and 2001. Defendants lack sufficient
22 information to either admit or deny the current residence of Plaintiff M.O.2
23 and therefore deny same. Defendants deny the remaining allegations in
24 paragraph 6.3.131.

25 132. Plaintiff M.P. has been dismissed from this lawsuit. Defendants deny the
26 allegations in paragraph 6.3.132.
27

133. Defendants admit Plaintiff M.P.2 was a minor when she resided at Echo Glen Children's Center in 2008. Defendants admit Plaintiff M.P.2 continued to reside at Echo Glen in 2009. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff M.P.2 and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.133.

134. Defendants lack sufficient information to either admit or deny whether Plaintiff M.R. resided at Green Hill School and therefore deny same. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff M.R. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.134.

135. Defendants admit Plaintiff M.S. was a minor when he resided at Green Hill School in 2015. Defendants admit Plaintiff M.S. continued to reside at Green Hill School in 2015-2016, and for periods of time in 2020 and 2021. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff M.S. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.135.

136. Defendants admit Plaintiff N.H. was a minor when he resided at Maple Lane School in 2003-2004. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff N.H. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.136.

137. Defendants lack sufficient information to either admit or deny whether Plaintiff N.L. resided at Echo Glen Children's Center and therefore deny same. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff N.L. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.137.

1 138. Defendants lack sufficient information to either admit or deny whether
2 Plaintiff N.Z. resided at Naselle Youth Camp and therefore deny same.
3 Defendants lack sufficient information to either admit or deny the current
4 residence of Plaintiff N.Z. and therefore deny same. Defendants deny the
5 remaining allegations in paragraph 6.3.138.

6 139. Defendants admit Plaintiff O.C. was a minor when he resided at Green
7 Hill School in 1999-2000. Defendants admit Plaintiff O.C. resided at Green
8 Hill School for periods of time in 2002-2003. Defendants lack sufficient
9 information to either admit or deny the current residence of Plaintiff M.S. and
10 therefore deny same. Defendants deny the remaining allegations in paragraph
11 6.3.139.

12 140. Defendants admit Plaintiff P.B. was a minor when he resided at Maple
13 Lane School in 2001. Defendants lack sufficient information to either admit
14 or deny the current residence of Plaintiff P.B. and therefore deny
15 same. Defendants deny the remaining allegations in paragraph 6.3.140.

16 141. Defendants admit Plaintiff P.W. was a minor when he resided at Green
17 Hill School for periods of time in 2014. Defendants lack sufficient
18 information to either admit or deny the current residence of Plaintiff P.W. and
19 therefore deny same. Defendants deny the remaining allegations in paragraph
20 6.3.141.

21 142. Defendants admit Plaintiff R.A. was a minor when he resided at Echo
22 Glen Children's Center in 2006. Defendants admit Plaintiff R.A. was a minor
23 when he resided at Green Hill School in 2007-2008. Defendants lack
24 sufficient information to either admit or deny the current residence of Plaintiff
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27

1 R.A. and therefore deny same. Defendants deny the remaining allegations in
2 paragraph 6.3.142.

3 143. Defendants admit Plaintiff R.C. was a minor when he resided at Naselle
4 Youth Camp in 2013. Defendants lack sufficient information to either admit
5 or deny the current residence of Plaintiff R.C. and therefore deny
6 same. Defendants deny the remaining allegations in paragraph 6.3.143.

7
8 144. Defendants lack sufficient information to either admit or deny whether
9 Plaintiff R.J. resided at Green Hill School and therefore deny same.
10 Defendants lack sufficient information to either admit or deny the current
11 residence of Plaintiff R.J. and therefore deny same. Defendants deny the
12 remaining allegations in paragraph 6.3.144.

13 145. Defendants admit Plaintiff R.L. was a minor when he resided at Maple
14 Lane School in 1992-1993. Defendants lack sufficient information to either
15 admit or deny the current residence of Plaintiff R.L. and therefore deny
16 same. Defendants deny the remaining allegations in paragraph 6.3.145.

17
18 146. Defendants lack sufficient information to either admit or deny whether
19 Plaintiff R.P. resided at Echo Glen Children's Center and therefore deny
20 same. Defendants lack sufficient information to either admit or deny the
21 current residence of Plaintiff R.P. and therefore deny same. Defendants deny
22 the remaining allegations in paragraph 6.3.146.

23 147. Defendants admit Plaintiff R.P.2 was a minor when he resided at Green
24 Hill School for periods of time in 1986-1987. Defendants lack sufficient
25 information to either admit or deny the current residence of Plaintiff R.P.2 and
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1 therefore deny same. Defendants deny the remaining allegations in paragraph
2 6.3.147.

3 148. Defendants admit Plaintiff R.S. was a minor when he resided at Naselle
4 Youth Camp in 1991. Defendants lack sufficient information to either admit
5 or deny the current residence of Plaintiff R.S. and therefore deny
6 same. Defendants deny the remaining allegations in paragraph 6.3.148.

7
8 149. Defendants admit Plaintiff R.S.2 was a minor when he resided at Mission
9 Creek Youth Camp for periods of time in 1991 and 1992. Defendants lack
10 sufficient information to either admit or deny the current residence of Plaintiff
11 R.S.2 and therefore deny same. Defendants deny the remaining allegations in
12 paragraph 6.3.149.

13 150. Defendants lack sufficient information to either admit or deny whether
14 Plaintiff R.T. resided at Echo Glen Children's Center and therefore deny
15 same. Defendants lack sufficient information to either admit or deny the
16 current residence of Plaintiff R.T. and therefore deny same. Defendants deny
17 the remaining allegations in paragraph 6.3.150.

18
19 151. Defendants admit Plaintiff S.B. was a minor when she resided at Echo
20 Glen Children's Center in 2001-2003, and for a period of time in 2005.
21 Defendants lack sufficient information to either admit or deny the current
22 residence of Plaintiff S.B. and therefore deny same. Defendants deny the
23 remaining allegations in paragraph 6.3.151.

24 152. Defendants lack sufficient information to either admit or deny whether
25 Plaintiff S.B.2 resided at Echo Glen Children's Center and therefore deny
26 same. Defendants lack sufficient information to either admit or deny the
27

current residence of Plaintiff S.B.2 and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.152.

153. Defendants admit Plaintiff S.C.2 was a minor when she resided at Echo Glen Children's Center in 1998-1999. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff S.C. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.153.

154. Defendants admit Plaintiff S.C.2 was a minor when she resided at Echo Glen Children's Center in in 2000. Defendants admit Plaintiff S.C.2 was a minor when she resided at Naselle Youth Camp in 2000-2001. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff S.C.2 and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.154.

155. Defendants admit Plaintiff S.C.3 was a minor when he resided at Naselle Youth Camp in 2011. Defendants lack sufficient information to either admit or deny whether Plaintiff S.C.3 resided at Hutton Settlement Boys Home in Spokane and therefore deny same. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff S.C.3 and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.155.

156. Defendants admit Plaintiff S.E. was a minor when he resided at Naselle Youth Camp for periods of time in 2004 and 2005. Defendants admit Plaintiff S.E. was a minor when he resided at Green Hill School in 2005-2006. Defendants admit Plaintiff S.E. was a minor when resided at Parke Creek Community Facility for periods of time in 2004 and 2006. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff

1 S.E. and therefore deny same. Defendants deny the remaining allegations in
2 paragraph 6.3.156.

3 157. Defendants admit Plaintiff S.G. was a minor when he resided at Echo Glen
4 Children's Center in 1992 and 1994-1995, and that he continued to live At
5 Echo Glen in 1995. Defendants lack sufficient information to either admit or
6 deny the current residence of Plaintiff S.G. and therefore deny
7 same. Defendants deny the remaining allegations in paragraph 6.3.157.
8

9 158. Defendants admit Plaintiff S.H. was a minor when he resided at Indian
10 Ridge Youth Camp for periods of time in 1996 and 1997. Defendants admit
11 Plaintiff S.H. was a minor when he resided at Maple Lane School for periods
12 of time in 1998. Defendants admit Plaintiff S.H. continued to live at Maple
13 Lane School for periods of time in 1998. Defendants lack sufficient
14 information to either admit or deny the current residence of Plaintiff S.H. and
15 therefore deny same. Defendants deny the remaining allegations in paragraph
16 6.3.158.

17 159. Defendants admit Plaintiff S.L. was a minor when he resided at Naselle
18 Youth Camp in 2004. Defendants lack sufficient information to either admit
19 or deny the current residence of Plaintiff S.L. and therefore deny
20 same. Defendants deny the remaining allegations in paragraph 6.3.159.
21

22 160. Defendants admit Plaintiff S.M. was a minor when she resided at Echo
23 Glen Children's Center for periods of time in 1996, 1997 and 1998.
24 Defendants admit Plaintiff S.M. was a minor when she resided at Aloha
25 House for periods of time in 1996, 1997 and 1998. Defendants lack sufficient
26 information to either admit or deny the current residence of Plaintiff S.M. and
27

1 therefore deny same. Defendants deny the remaining allegations in paragraph
2 6.3.160.

3 161. Defendants admit Plaintiff S.W. was a minor when he resided at Naselle
4 Youth Camp in 2019-2020, and that he resided at Naselle Youth Camp for a
5 period of time in 2020. Defendants lack sufficient information to either admit
6 or deny the current residence of Plaintiff S.W. and therefore deny
7 same. Defendants deny the remaining allegations in paragraph 6.3.161.
8

9 162. Defendants admit Plaintiff T.C. was a minor when he resided at Naselle
10 Youth Camp for periods of time in 1986. Defendants lack sufficient
11 information to either admit or deny the current residence of Plaintiff T.C. and
12 therefore deny same. Defendants deny the remaining allegations in paragraph
13 6.3.162.

14 163. Defendants lack sufficient information to either admit or deny whether
15 Plaintiff T.E. resided at Maple Lane School or Green Hill School and
16 therefore deny same. Defendants lack sufficient information to either admit or
17 deny the current residence of Plaintiff T.E. and therefore deny
18 same. Defendants deny the remaining allegations in paragraph 6.3.163.
19

20 164. Defendants admit Plaintiff T.J. was a minor when he resided at Green Hill
21 School for periods of time in 2006-2008, and that he resided again at Green
22 Hill School in 2008 and 2009. Defendants admit Plaintiff T.J. resided at
23 Griffin C.C.F. for periods of time in 2008. Defendants lack sufficient
24 information to either admit or deny the current residence of Plaintiff T.C. and
25 therefore deny same. Defendants deny the remaining allegations in paragraph
26 6.3.164.
27

1 165. Defendants admit Plaintiff T.M. was a minor when he resided at Naselle
2 Youth Camp for periods of time in 2015. Defendants admit Plaintiff T.M.
3 continued to reside at Naselle Youth Camp for periods of time in 2015.
4 Defendants lack sufficient information to either admit or deny the current
5 residence of Plaintiff T.M. and therefore deny same. Defendants deny the
6 remaining allegations in paragraph 6.3.165.

7
8 166. Defendants admit Plaintiff T.M.2 was a minor when he resided at Maple
9 Lane School in 1986. Defendants lack sufficient information to either admit
10 or deny the current residence of Plaintiff T.M.2 and therefore deny
11 same. Defendants deny the remaining allegations in paragraph 6.3.166.

12 167. Defendants admit Plaintiff T.M.3 was a minor when he resided at Green
13 Hill School for periods of time in 1987 and 1988. Defendants admit Plaintiff
14 T.M.3 was a minor when he resided at Echo Glen Children's Center for
15 periods of time in 1985 and 1986-1987. Defendants admit Plaintiff T.M.3
16 was a minor when he resided at Maple Lane School for periods of time in
17 1987 and 1988. Defendants lack sufficient information to either admit or
18 deny whether Plaintiff T.M.3 resided at Ruth Dykeman Children's Center and
19 therefore deny same. Defendants lack sufficient information to either admit or
20 deny the current residence of Plaintiff T.M.3 and therefore deny
21 same. Defendants deny the remaining allegations in paragraph 6.3.167.

22 168. Defendants admit Plaintiff T.O. was a minor when she resided at Echo
23 Glen Children's Center for periods of time in 1994-1995, and 1996.
24 Defendants admit Plaintiff T.O. also resided at Echo Glen Children's Hospital
25 in 1998. Defendants lack sufficient information to either admit or deny the
26
27

current residence of Plaintiff T.O. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.168.

169. Defendants admit Plaintiff T.T. was a minor when he resided at Echo Glen Children's Center for periods of time in 1988-1989 and 1989-1990. Defendants admit Plaintiff T.T. was a minor when he resided at Mission Creek Youth Camp in 1991. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff T.T. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.169.

170. Defendants admit Plaintiff T.Y. was a minor when he resided at Naselle Youth Camp in 1988. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff T.Y. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.170.

171. Defendants admit Plaintiff V.H. was a minor when she resided at Echo Glen Children's Center in 1989. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff V.H. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.171.

172. Defendants admit Plaintiff W.C. was a minor when he resided at Maple Lane School in 1989. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff W.C. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.172.

173. Defendants admit Plaintiff W.K. was a minor when he resided at Green Hill School in 2000. Defendants lack sufficient information to either admit or deny the current residence of Plaintiff W.K. and therefore deny same. Defendants deny the remaining allegations in paragraph 6.3.173.

1 174. Defendants admit Plaintiff W.S. was a minor when he resided at Green
2 Hill School in 1989. Defendants lack sufficient information to either admit or
3 deny the current residence of Plaintiff W.S. and therefore deny
4 same. Defendants deny the remaining allegations in paragraph 6.3.174.

5 175. Defendants lack sufficient information to either admit or deny whether
6 Plaintiff W.W. resided at Fort Worden Diagnostic Center or Green Hill
7 School and therefore deny same. Defendants lack sufficient information to
8 either admit or deny the current residence of Plaintiff W.W. and therefore
9 deny same. Defendants deny the remaining allegations in paragraph 6.3.175.

10
11 176. Defendants admit Plaintiff Z.B. was a minor when he resided at Maple
12 Lane School for periods of time in 1998. Defendants admit Plaintiff Z.B.
13 continued to reside at Maple Lane School for periods of time in 1998-2001.
14 Defendants lack sufficient information to either admit or deny the current
15 residence of Plaintiff Z.B. and therefore deny same. Defendants deny the
16 remaining allegations in paragraph 6.3.176.

17 **VII. LIABILITY**

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

22 **VIII. DAMAGES**

23 Defendants deny the allegations in Section VIII.
24
25
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1 **IX. JURY DEMAND**

2 Section IX contains legal argument and legal conclusions to which no response is
3 required. Defendants otherwise admit Plaintiffs' Amended Complaint demands the case be tried
4 by a jury.

5 **X. PRAYER FOR RELIEF**

6 Defendants deny Plaintiffs are entitled to any of the relief or damages identified in their
7 Prayer for Relief set out in Section X, Paragraphs (a)-(e) of the Amended Complaint. Defendants
8 further deny any and all allegations set forth in Plaintiffs' Amended Complaint that are not
9 expressly admitted above.

10 **XI. AFFIRMATIVE DEFENSES**

11 By Way of FURTHER ANSWER and FIRST AFFIRMATIVE DEFENSE, Defendants
12 allege that Plaintiffs' injuries/damages, if any, were caused by the intentional conduct of his or
13 her alleged abusers and other individuals yet to be identified. The damages caused by the
14 intentional conduct must be segregated from injuries/damages allegedly caused by fault.

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

17 By Way of FURTHER ANSWER and THIRD AFFIRMATIVE DEFENSE, Defendants
18 allege that Plaintiffs' claims are barred by reason of laches.

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

21 By Way of FURTHER ANSWER and FIFTH AFFIRMATIVE DEFENSE, Defendants
22 allege that if Plaintiffs suffered any damages, recovery is therefore barred by Plaintiffs' failure to
23 mitigate said damages.

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

1 By Way of FURTHER ANSWER and SEVENTH AFFIRMATIVE DEFENSE,
2 Defendants allege that the damages and/or injuries, if any, were caused by the fault of one or
3 more nonparties for purposes of RCW 4.22.070(1), including but not limited to contracted
4 facilities such as Aloha House, Camp Outlook (Juvenile Offender Basic Training Camp),
5 Cascadia Juvenile Reception and Diagnostic Center, Cedar Creek Youth Forestry Camp,
6 Diamond Group Home, Durango Street Group Home, Fort Worden Diagnostic Center, Griffin
7 Home - Friends of Youth, Haven House, Hutton Settlement Home, Kamp Kachess / Double K
8 Ranch, Okanogan Juvenile Detention Center, Rocking Arrow Boys Ranch, Ruth Dykeman
9 Children's Center, Seattle Children's Hospital (Mental Health Unit), Touchstone Community
10 Facility, and a youth center near Garfield High School.

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

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

20 By Way of FURTHER ANSWER and TENTH AFFIRMATIVE DEFENSE, Defendants
21 allege that Plaintiffs have failed to file a claim against Defendants as required by RCW 4.92.100
22 and .110, or that the claims filed are insufficient.

23 By Way of FURTHER ANSWER and ELEVENTH AFFIRMATIVE DEFENSE,
24 Defendants allege that Plaintiffs' actions against Defendants are barred by the doctrine of res
25 judicata and/or collateral estoppel.
26
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1 By Way of FURTHER ANSWER and TWELFTH AFFIRMATIVE DEFENSE,
2 Defendants allege that Plaintiffs have failed to join an indispensable party or parties and
3 therefore the action will not lie.

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

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

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

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

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

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

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

25 By Way of FURTHER ANSWER and TWENTIETH AFFIRMATIVE DEFENSE,
26 Defendants allege that this action is barred by RCW 4.24.595(2).
27

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

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

6 **XII. DEFENDANTS' RESERVATION OF RIGHTS**

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

11 **XIII. NO WAIVER**

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

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

16 WHEREFORE, Defendants pray that Plaintiffs' Amended Complaint be dismissed with
17 prejudice as to Defendants, that Plaintiffs take nothing by their Amended Complaint, and that
18 Defendants be allowed their costs and reasonable attorney fees herein.
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1 DATED: February 21, 2025.

MARKOWITZ HERBOLD PC

2
3 s/ Molly K. Honoré

4 Lauren F. Blaesing, WSBA #53310

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DEFENDANTS' ANSWER TO A.A. PLAINTIFFS' AMENDED COMPLAINT on the parties listed below in the manner indicated:

☐ U.S. Mail
☐ Facsimile
☐ Hand Delivery
☐ Overnight Courier
☐ e-Service via **eFiling**
☒ Email: vanessa@bergmanlegal.com
ruby@bergmanlegal.com
service@bergmanlegal.com

s/ Molly K. Honoré
Molly K. Honoré, *pro hac vice*
Special Assistant Attorney General for
Defendants Department of Children, Youth, and
Families and Juvenile Rehabilitation
Administration