

FILED  
SUPREME COURT  
STATE OF WASHINGTON  
1/29/2021 2:48 PM  
BY SUSAN L. CARLSON  
CLERK

No. 99344-1

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**SUPREME COURT OF THE STATE OF WASHINGTON**

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IN RE THE PERSONAL RESTRAINT OF

Robert R. Williams,

Petitioner.

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**PETITIONER'S REPLY TO DOC'S ANSWER TO MOTION FOR  
DISCRETIONARY REVIEW**

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WASHINGTON INNOCENCE PROJECT  
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## I. STATEMENT OF ADDITIONAL FACTS

The virus continues to run rampant throughout DOC facilities and at Coyote Ridge Corrections Center (CRCC). Among the incarcerated population across all DOC facilities, confirmed cases have increased by a staggering 2,538 in just over a month.<sup>1</sup> Five additional men have died in DOC custody, bringing the total deaths to 10.<sup>2</sup>

Since Mr. Williams filed his Motion for Discretionary Review on December 22, 2020, the total confirmed cases at CRCC went from 351 to 395.<sup>3</sup> Within the last 30 days, there have been 42 new confirmed cases.<sup>4</sup> Alarming, on January 28, 2021, a CRCC counselor informed undersigned counsel that Mr. Williams' pod has again been placed on quarantine.<sup>5</sup> As time passes, COVID-19 continues to worsen at CRCC, as does Mr. Williams' health. And CRCC is particularly ill-equipped to care

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<sup>1</sup> Confirmed cases amongst incarcerated individuals at all DOC facilities have risen from 3,385 on December 18, 2020, to 5,922 on January 28, 2021. Mot. for Discretionary Review at 2; Dep't. of Corr., *COVID-19 Data*, <https://www.doc.wa.gov/corrections/covid-19/data.htm#confirmed> (last visited Jan. 29, 2021).

<sup>2</sup> Mot. for Discretionary Review at 2; Dep't. of Corr., *COVID-19 Data*, <https://www.doc.wa.gov/corrections/covid-19/data.htm#confirmed> (last visited Jan. 29, 2021).

<sup>3</sup> Mot. for Discretionary Review at 2; Dep't. of Corr., *COVID-19 Data*, <https://www.doc.wa.gov/corrections/covid-19/data.htm#confirmed> (last visited Jan. 29, 2021).

<sup>4</sup> Dep't. of Corr., *COVID-19 Data*, <https://www.doc.wa.gov/corrections/covid-19/data.htm#confirmed> (last visited Jan. 20, 2021).

<sup>5</sup> Ex. 1 (Vial Decl.) ¶ 4, Att. 1, at 2.

for individuals at higher risk for COVID-19 complications.<sup>6</sup> The virus remains a serious threat to his safety, and DOC is unable to provide constitutional conditions of confinement to keep him safe.

This Court should accept review of Mr. Williams' claims that his confinement violates article 1, section 14 of the Washington Constitution and the Eighth Amendment and grant his Personal Restraint Petition by transferring him to home confinement.

## II. ARGUMENT

Mr. Williams' claims meet RAP 13.4(b)'s requirements for review. Contrary to DOC's characterization, its constitutional violations are ongoing, and Mr. Williams' claims regarding his current conditions should be reviewed. Finally, this Court can, and should, order DOC to transfer Mr. Williams to home confinement at his sister's home.

### A. This Court Should Accept Review of Both Constitutional Claims

Mr. Williams' claims involve "a significant question of law under the Constitution of the State of Washington" and "an issue of substantial

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<sup>6</sup> Off. of Corr. Ombuds, *Investigation of the Coronavirus Disease 2019 (COVID-19) Outbreak at Coyote Ridge Corrections Center (CRCC)*, (Nov. 13, 2020) 5-6, <https://oco.wa.gov/sites/default/files/CRCC%20Outbreak%20Investigation%20Final.pdf>. (finding it "clear that CRCC did not have sufficient facilities to care for individuals at higher risk for complications due to COVID-19" and warning that "access to outside medical resources in the community is limited").

public interest.” RAP 13.4(b). Review of both of Mr. Williams’ constitutional claims is warranted.

The Court of Appeals, in the case below, broke new ground in state constitutional law. It held for the first time that Washington’s constitution provides greater protection than its federal counterpart in the context of confinement conditions. *Matter of Williams*, No. 54629-9-II, 476 P.3d 1064, 1078 (2020). It went even further by crafting a new legal test to determine whether a violation of article 1, section 14 has occurred. *Id.* at 1078–79. In recent history, this Court has accepted review when a lower court extends article 1, section 14 in a new context. *See State v. Gregory*, 192 Wn.2d 1, 427 P.3d 621 (2018); *State v. Bassett*, 192 Wn.2d 67, 427 P.3d 621 (2018). This matter presents a novel and significant question of state constitutional law that should be resolved by the state’s highest court.

DOC argues that “[o]ne decision applying a specific standard or test in response to a unique situation” does not warrant review, and asserts that the lower court’s decision is consistent with unpublished Court of Appeals decisions rejecting similar claims on Washington Constitutional grounds.<sup>7</sup> Unlike the decision at issue here, those courts did not hold that article 1, section 14 provides greater protection than the Eighth Amendment, and they did not articulate a new standard that will affect

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<sup>7</sup> Answer at 12 (citing *Matter of Hargrove*, No. 37572-2-III (Dec. 10, 2020); *Matter of Gorski*, No. 37589-7-III (Dec. 8, 2020); *Matter of Pauley*, 13 Wn. App. 2d 292 (2020)).

future litigants claiming their conditions of confinement violate Washington’s cruel punishment provision. The proper adjudication of article 1, section 14 claims in the context of conditions of confinement warrant this Court’s attention.

Moreover, Mr. Williams’ claims under the state and federal constitutions present an issue of substantial public interest. DOC argues this case “involves a narrow, highly fact-specific inquiry that is only of interest to the Petitioner himself.”<sup>8</sup> While Mr. Williams’ situation is unique in that his age, race, and medical conditions make him more vulnerable to the virus’s effects than most, the standards for adjudicating claims of unconstitutionally cruel conditions of confinement in the context of a deadly virus affects all people incarcerated in Washington. In *Colvin v. Inslee*—which does not resolve Mr. Williams’ claims—this Court retained jurisdiction in part “because of the extraordinary danger COVID-19 . . . poses to inmates in Washington’s prisons.” 195 Wn.2d 879, 884, 467 P.3d 953 (2020). The spread of COVID-19 throughout our state prisons is of utmost public interest, and this Court should grant review of both claims on this basis.

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<sup>8</sup> Answer at 9.

**B. Mr. Williams' Current Conditions of Confinement Remain Unconstitutional Under the Federal and State Constitutions**

The constitutional violations against Mr. Williams are ongoing, and his claims do not rely on past harms. As detailed above, dangerous developments that increase Mr. Williams' risk of contracting the virus continue to emerge and are far from resolved. CRCC currently has another outbreak in its general population unit, and Mr. Williams' pod is in quarantine.<sup>9</sup> New strains of the virus are potentially more deadly and have made their way into the United States from abroad, exacerbating the likelihood that active cases will continue to increase.<sup>10</sup>

Mr. Williams' health is also worsening.<sup>11</sup> He was hospitalized again in early December for stroke-like symptoms.<sup>12</sup> He can no longer push his own wheelchair even a few feet and now requires assistance toileting.<sup>13</sup> In mid-December, a five-member CRCC Multi-Disciplinary Team referred Mr. Williams' case to DOC headquarters for an Extraordinary Medical Placement (EMP) review.<sup>14</sup> DOC denied the EMP referral and continues to confine Mr. Williams in the same type of dry cell

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<sup>9</sup> Dep't. of Corr., *COVID-19 Data*, <https://www.doc.wa.gov/corrections/covid-19/data.htm#confirmed> (last visited Jan. 29, 2021); Ex 1. (Vial Decl.) ¶ 4, Att. 1, at 2.

<sup>10</sup> *Transcript: Anthony Fauci on "Face the Nation," January 24, 2021*, CBS News (Jan. 24, 2021), <https://www.cbsnews.com/news/transcript-anthony-fauci-on-face-the-nation-january-24-2021/>.

<sup>11</sup> Mot. for Discretionary Review, Ex. 2, Att. C (Supp. Decl. of Robert Williams) ¶ 9.

<sup>12</sup> Pet'r Reply to Resp. to Mot. for Release and Accelerated Review, Ex. 1, Att. A.

<sup>13</sup> *Id.*

<sup>14</sup> DOC Resp. to Mot for Release and Accelerated Review., Ex. 1, Att. A, at 9 (12/17/2020 Leigh, Mark D).



in the general population unit that led to his COVID-19 infection.<sup>15</sup> This demonstrates ongoing disregard for the risk COVID-19 poses to Mr. Williams and violates the Eighth Amendment of the federal constitution and Washington's more protective cruel punishment provision. This Court should accept review to address these ongoing harms.

DOC seems to interpret the *Colvin* ruling as a rubber stamp on its COVID-19 response, precluding any petitioner from demonstrating unconstitutional conditions of confinement.<sup>16</sup> In *Colvin*, this Court explicitly kept the door open for future claims with different records, affirming “[t]he result might be different on different facts, and [the Court does] not suggest the inadequacy of safety measures can never amount to deliberate indifference.” *Colvin*, 195 Wn.2d at 901. Mr. Williams’ claims and factual record are substantially different from those presented in *Colvin*. Moreover, the *Colvin* Court did not conduct an independent evaluation of the Petitioners’ claims under the Washington Constitution. *Id.* at 900. Therefore, *Colvin* has no bearing on Mr. Williams’ article 1, section 14 claim.

### **C. Release Is the Proper Remedy.**

This Court has the authority to order DOC to initiate Mr. Williams’ transfer request to Florida so he can be placed on home confinement in his

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<sup>15</sup> Mot. for Discretionary Review, Ex. 2, Att. C (Supp. Decl. of Robert Williams) ¶ 1.

<sup>16</sup> Answer at 8–9.

sister's care. Mr. Williams is not asking this Court to allow him to "simply leave prison early" or to "commute [his] sentence."<sup>17</sup> His request is to continue serving his sentence in a place where it is safe for him to do so, while being monitored by probation services.

A court has the authority to "grant appropriate relief to a petitioner" if the petitioner's restraint is deemed unlawful. RAP 16.4(a). If this Court accepts review and finds Mr. Williams' confinement conditions violate the constitution, it must remedy them. Home confinement is the only reasonable remedy because the unconstitutional conditions of Mr. Williams' confinement are predicated on his imprisonment in a DOC facility. If this Court orders DOC to place Mr. Williams on home confinement to comply with the constitution, DOC must do so.

Contrary to DOC's assertions, this Court can order DOC to facilitate Mr. Williams' transfer to home detention in Florida with his sister. Florida Probation Services confirmed it can accommodate supervision responsibilities for Mr. Williams' home confinement if his sister's residence is safe.<sup>18</sup> First, DOC must initiate a transfer request with the Florida Department of Corrections at least 120 days prior to his release.<sup>19</sup> Within 30 days, Florida probation services will complete an

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<sup>17</sup> Answer at 19.

<sup>18</sup> Ex. 2 (Campbell-Harris Decl.) ¶¶ 4-9.

<sup>19</sup> *Id.* ¶ 6.

investigation into Angie Williams' residence to ensure it is safe for Mr. Williams.<sup>20</sup> Once the investigation is complete, DOC can place Mr. Williams in his sister's home while the Florida Probation services monitor him.<sup>21</sup> And in the interim, Angie Williams has expressed that she can provide for Mr. Williams' care upon release in Washington State. Ex. 3 (A. Williams Decl.), Ex. 2 (Campbell-Harris Decl.) ¶10.

### III. CONCLUSION

Petitioner Robert R. Williams' Motion for Discretionary Review should be granted.

DATED this 29th day of January, 2021.

Respectfully submitted,

WASHINGTON INNOCENCE PROJECT

/s/

\_\_\_\_\_  
Jacqueline McMurtrie, WSBA No. 13587  
Kaylan L. Lovrovich, WSBA No. 55609  
Dayton Campbell-Harris, Rule 9 Intern No. 9883005  
Tierney Vial, Rule 9 Intern No. 9880669

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<sup>20</sup> *Id.* ¶ 7.

<sup>21</sup> *Id.* ¶ 8.

# EXHIBIT 1

No. 99344-1

**SUPREME COURT OF THE STATE OF WASHINGTON**

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IN RE THE PERSONAL RESTRAINT OF

Robert R. Williams,

Petitioner.

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**DECLARATION OF TIERNEY VIAL**

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WASHINGTON INNOCENCE PROJECT  
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4293 Memorial Way N.E.  
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Dayton Campbell-Harris, Rule 9 Intern No. 9883005  
Tierney Vial, Rule 9 Intern No. 9880669

*Attorneys for Petitioner*

I, Tierney Elizabeth Vial, declare under penalty of perjury under the laws of the State of Washington that the following statements are true and correct to my best knowledge and belief:

1. I am a Rule 9 student member of the Washington Innocence Project clinic. I have been working on Mr. Williams' case since our clinic accepted his application asserting actual innocence in fall of 2019.
2. When COVID reached Washington State, we shifted our advocacy to keep Mr. Williams safe from the virus. I have been in charge of arranging legal phone calls with the counselors at Coyote Ridge Corrections Center (CRCC).
3. Because of his disabilities, Mr. Williams requires assistance with phone calls. His wheelchair cannot fit into the legal phone booths, and he lacks the fine muscle control in his hands and eyesight to dial a phone number. Accordingly, Mr. Williams' counselor assists with dialing his attorney from the phone in her office.
4. Attached to this declaration as Attachment 1 is a true and correct copy of emails I received from Rachel Rand, a CRCC counselor, on Thursday, January 28, 2021 at 8:31 a.m., and Friday, January

29, 2021 at 12:43 p.m. regarding a quarantine in Mr. Williams' pod.

DATED this 29th day of January, 2021, at Cannon Beach, Oregon.

  
Tierney Vial



Tierney Vial &lt;vialt@uw.edu&gt;

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**Mr. Williams Legal call 1/27 1pm**

9 messages

**Tierney Vial** <vialt@uw.edu>

Tue, Jan 19, 2021 at 6:44 PM

To: "Rand, Rachel E. (DOC)" &lt;rerand@doc1.wa.gov&gt;

Dear Ms. Rand,

I hope you are well. Would it be possible to schedule a legal call between Mr. Williams and his attorney on Wednesday, January 27 at 1 pm?

Thank you,

Tierney Vial

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**Tierney Vial** <vialt@uw.edu>

Mon, Jan 25, 2021 at 9:47 AM

To: "Rand, Rachel E. (DOC)" &lt;rerand@doc1.wa.gov&gt;

Good morning Ms. Rand,

Just checking in on the potential for a legal call with Mr. Williams this Wednesday, January 27 at 1 pm. When you have a moment, could you confirm whether that works for you?

Thank you,

Tierney Vial

[Quoted text hidden]

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**Rand, Rachel E. (DOC)** <rerand@doc1.wa.gov>

Tue, Jan 26, 2021 at 6:18 AM

To: Tierney Vial &lt;vialt@uw.edu&gt;

Cc: "Cook, Phillip E. (DOC)" &lt;pecook@doc1.wa.gov&gt;

Yes this should work either myself or CC2 Cook will be in office to facilitate this.

Thank You for Your Time,

CC2 Rand, Rachel

CRCC I Unit x3526





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**From:** Tierney Vial [mailto:[vialt@uw.edu](mailto:vialt@uw.edu)]  
**Sent:** Monday, January 25, 2021 9:47 AM  
**To:** Rand, Rachel E. (DOC) <[rerand@DOC1.WA.GOV](mailto:rerand@DOC1.WA.GOV)>  
**Subject:** Re: Mr. Williams Legal call 1/27 1pm

External Email

[Quoted text hidden]

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**Tierney Vial** <[vialt@uw.edu](mailto:vialt@uw.edu)> Tue, Jan 26, 2021 at 12:42 PM  
To: "Rand, Rachel E. (DOC)" <[rerand@doc1.wa.gov](mailto:rerand@doc1.wa.gov)>, "Cook, Phillip E. (DOC)" <[pecook@doc1.wa.gov](mailto:pecook@doc1.wa.gov)>

Thank you we appreciate it. The number to dial for his lead attorney, Jacqueline McMurtrie, is 206-543-5780.

Sincerely,

Tierney Vial  
[Quoted text hidden]

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**Tierney Vial** <[vialt@uw.edu](mailto:vialt@uw.edu)> Wed, Jan 27, 2021 at 1:15 PM  
To: "Rand, Rachel E. (DOC)" <[rerand@doc1.wa.gov](mailto:rerand@doc1.wa.gov)>, "Cook, Phillip E. (DOC)" <[pecook@doc1.wa.gov](mailto:pecook@doc1.wa.gov)>

Dear Ms. Rand and Mr. Cook,

We hope you are well. Will a call today still work? If not, would it be possible to have a call at 12 on Friday?

Thank you,

Tierney Vial  
[Quoted text hidden]

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**Rand, Rachel E. (DOC)** <[rerand@doc1.wa.gov](mailto:rerand@doc1.wa.gov)> Thu, Jan 28, 2021 at 8:31 AM  
To: Tierney Vial <[vialt@uw.edu](mailto:vialt@uw.edu)>, "Cook, Phillip E. (DOC)" <[pecook@doc1.wa.gov](mailto:pecook@doc1.wa.gov)>

Due to COVID the pod that Williams is on has been placed on Quarantine. I have requested approval to have Williams moved to complete the phone call and am waiting for a response.

[Quoted text hidden]

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**Tierney Vial** <[vialt@uw.edu](mailto:vialt@uw.edu)> Thu, Jan 28, 2021 at 1:17 PM  
To: "Rand, Rachel E. (DOC)" <[rerand@doc1.wa.gov](mailto:rerand@doc1.wa.gov)>  
Cc: "Cook, Phillip E. (DOC)" <[pecook@doc1.wa.gov](mailto:pecook@doc1.wa.gov)>

Dear Ms. Rand,

We are very sorry to hear this news. We would appreciate anything you could do to facilitate the call.

Sincerely,

Tierney Vial  
[Quoted text hidden]

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**Tierney Vial** <vialt@uw.edu>  
To: "Rand, Rachel E. (DOC)" <rerand@doc1.wa.gov>  
Cc: "Cook, Phillip E. (DOC)" <pecook@doc1.wa.gov>

Fri, Jan 29, 2021 at 9:38 AM

Dear Ms. Rand and Mr. Cook,

I hope you are well. I wanted to check in and see if you have heard back on your request for approval for a legal call today.

Thank you,

Tierney Vial

[Quoted text hidden]

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**Rand, Rachel E. (DOC)** <rerand@doc1.wa.gov>  
To: Tierney Vial <vialt@uw.edu>

Fri, Jan 29, 2021 at 12:43 PM

I have not heard back yet. I do not know how long the quarantine will last. I will let you know more when I know more.

[Quoted text hidden]

# EXHIBIT 2

No. \_99344-1

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**SUPREME COURT OF THE STATE OF WASHINGTON**

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IN RE THE PERSONAL RESTRAINT OF

Robert R. Williams,

Petitioner.

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**DECLARATION OF DAYTON CAMPBELL-HARRIS**

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WASHINGTON INNOCENCE PROJECT  
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Dayton Campbell-Harris, Rule 9 Intern No. 9883005  
Tierney Vial, Rule 9 Intern No. 9880669

*Attorneys for Petitioner*

I, Dayton Campbell-Harris, declare under penalty of perjury under the laws of the Washington that the following statements are true and correct to my best knowledge and belief:

**Relationship with Mr. Williams' Case**

1. Beginning in September, 2019, I started working on post-conviction relief for Mr. Williams as a student in the Washington Innocence Project Clinic at the University of Washington School of Law.
2. Throughout the Fall of 2019, our clinic team reviewed Mr. Williams' case. After consulting with him in December 2019, we decided to seek post-conviction DNA testing on different items that were collected from crime scene, but that were never tested. Mr. Williams has always maintained his innocence.
3. Once the COVID-19 pandemic swept across the country, our advocacy shifted. After seeing how vulnerable Mr. Williams is in his wheelchair, we began advocating for his lawful confinement conditions in home detention.

### **Call with Florida Probation Services**

4. I called the Florida Department of Corrections on Friday, January 22, to learn more about how a transfer of Mr. Williams' supervision to their state for home detention would work.
5. I spoke with an officer named Chris who worked in the Probation Services Office of Community Corrections.
6. Chris explained to me that Washington's Department of Corrections can seek a transfer request with the Florida Department of Corrections at least 120 days prior to Mr. Williams' release date, through the Interstate Compact Offender Tracking System (ICOTS). He mentioned that incarcerated people transfers are generally governed by the Interstate Commission for Adult Offender Supervision.
7. Once a transfer request is made, Florida's Department of Corrections will complete an investigation into the prospective residence for home detention. That residence would be Angie Williams' home. The Department should complete their investigation within 30 days of a request being made.
8. If the residence is considered safe for Mr. Williams' home detention, Chris explained, then the state can accept supervision

responsibilities for Mr. Williams. Because Mr. Williams' sister resides in Florida, he would qualify for a transfer there.

9. Chris elaborated that once Florida accepts Mr. Williams' supervision, Washington's Department of Corrections can move the release date to an earlier day. Washington's Department would, however, need to notify the state of Florida about that update.

**Discussion with Angie Williams**

10. On January 26, I spoke to Angie Williams about her ability to provide Mr. Williams the care he needs if released in Washington State. She reaffirmed that when Mr. Williams is released, she can provide for any needs he has while in Washington State, and upon his transfer to Florida.

DATED this 29<sup>th</sup> day of January 2021 in Seattle, Washington.



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Dayton Campbell-Harris

# EXHIBIT 3



No. \_\_\_\_\_

**SUPREME COURT OF THE STATE OF WASHINGTON**

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IN RE THE PERSONAL RESTRAINT OF

Robert R. Williams,

Petitioner.

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**DECLARATION OF ANGIE D. WILLIAMS**

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WASHINGTON INNOCENCE PROJECT  
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4293 Memorial Way N.E.  
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(206) 543-5780

Dayton L. Campbell-Harris, Law Student  
Tierney Vial, Law Student

*Attorneys for Petitioner*

I, Angie D. Williams, declare under penalty of perjury under the laws of the Washington that the following statements are true and correct to my best knowledge and belief:

1. I am 56 years old and am competent to testify as to the contents of this declaration.
2. I am currently residing in Jacksonville, Florida.
3. I am financially able and willing to care for my brother, Robert Rufus Williams, should he be released from Coyote Ridge Correctional Facility.
4. My sisters, one who lives nearby in Jacksonville and the other who lives in Charleston, SC, are also willing to support me and take care of Robert.

**Employment**

5. I am employed at the Jacksonville Transportation Authority. I serve as a Design and Construction Project Manager II.
6. I have been employed at the Jacksonville Transportation Authority for four years.
7. My educational background is a Bachelor of Science in Mechanical Engineering from the University of South Carolina.

8. I am currently pursuing a Master in Public Policy degree at Jacksonville University.
9. I have consistently stayed employed since graduating from the University of South Carolina.
10. I maintain a well structured and organized lifestyle.
11. My position at the Jacksonville Transportation Authority allows me to work from home while social distancing measures are implemented.

#### **Community Service**

12. I have been a member of good standing at Julington Baptist Church, in Jacksonville Florida.
13. I was appointed by the Mayor of Jacksonville to serve on the Construction Trade Qualifying board as the general contractor's representative for Duval County and am a State Certified General Contractor.

#### **Housing**

14. I am a single-family homeowner in Jacksonville, Florida.
15. I live in a home with five bedrooms and four bathrooms, where most of the bedrooms and major amenities are downstairs.
16. My home's entrance is a double door opening that provides ample space for a wheelchair to enter the house.

17. I have no roommates or live-in partners. I am currently engaged to the Chief Pilot and Special Agent for the Florida Department of Law Enforcement.

18. My home offers heating, air conditioning, and plumbing.

**Financial Stability**

19. The Jacksonville Transportation Authority pays me a salary sufficient to provide for both my brother and me, if he is released from Coyote Ridge Correctional Facility.

20. Should a situation arise where I was unable to financially support my brother, my sister has offered to support him.

21. I have a good credit score.

22. I am not nor have ever been at risk of having my home, vehicle(s), or other property being repossessed.

23. I am confident that my current financial situation allows me to take care of my brother for the duration of social distancing measures being implemented.

DATED this 16<sup>th</sup> day of April 2020 in Jacksonville, Florida.

Angie D. Williams, Project Manager  
1000 University Blvd, Suite 1000  
Jacksonville, Florida 32211  
Phone: 904.244.1234  
Fax: 904.244.1235

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Angie D. Williams

## CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing Petitioner's Response to DOC's Answer to Motion for Discretionary Review with the Washington State's Appellate Court Portal, which will send notice of such filing to:

WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL  
Haley Beach, WSBA #44731  
[Haley.Beach@atg.wa.gov](mailto:Haley.Beach@atg.wa.gov)

FRED T. KOREMATSU CENTER FOR LAW AND EQUALITY  
and JOE GOLDENSON, M.D.

Robert S. Chang, WSBA #44083

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Nancy Talner, WSBA #11196

[talner@aclu-wa.org](mailto:talner@aclu-wa.org)

Jaime Hawk, WSBA #35632

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I certify under penalty of perjury under the laws of the state of  
Washington that the foregoing is true and correct.

DATED this 29th day of January, 2021 in Seattle, Washington.



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Jacqueline McMurtrie, WSBA No. 13587

# WASHINGTON INNOCENCE PROJECT CLINIC

January 29, 2021 - 2:48 PM

## Transmittal Information

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 99344-1  
**Appellate Court Case Title:** Personal Restraint Petition of Robert Rufus Williams  
**Superior Court Case Number:** 07-1-03073-7

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