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10 UNITED STATES DISTRICT COURT
11 WESTERN DISTRICT OF WASHINGTON

12 ZACHARY PILZ, an individual,)
13 BREANDA CONTINE, an individual,) CASE NO.
14 JUAN LOPEZ, an individual,)
15 *et al.*,) COMPLAINT FOR INJUNCTIVE
16 Plaintiffs,) AND DECLARTORY RELIEF AND
17 v.) FOR DAMAGES
18 JAY INSLEE, Governor of the State of)
19 Washington, *et al.*,) JURY DEMANDED
20 Defendants.)

21 INTRODUCTION

22 1. Governor Jay Inslee's August 9, 2021 Proclamation by the Governor Amending
23 Proclamation 20-05, et seq. 21-14 – COVID-19 Vaccination Requirement ("Governor's
24 Mandate") and August 20, 2021 Amended Proclamation by the Governor Amending
25 Proclamations 20-05 And 20-14 21-14.1 Covid-19 Vaccination Requirement ("Mandate
Amendment") requiring state workers to be fully vaccinated against COVID-19 by October

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1 18, 2021 exceeds the authority of his office by the Washington Constitution statute, and,
2 independently, violates the rights guaranteed to the state workers by the Constitution of the
3 United States of America and other applicable law.

4 2. Other similarly situated individuals have had their attempts to obtain a hearing on the
5 merits in State Court stymied by the Governor's office, including the willful disobedience of a
6 State Court's Order for his Chief of Staff to sit for deposition.

7 3. Given the State's conduct in State Court, these Plaintiffs reluctantly come to his Court
8 as a last resort for legal relief and explicitly bring only Federal Causes of Action to avoid the
9 State's inevitable and ongoing attempts to delay these emergent issues.

10 **VENUE AND JURISDICTION**

11 4. This Court has jurisdiction pursuant to 28 USC §§ 1331 & 1343.

12 5. Venue is proper in this Court where the Defendants reside in and purport to act in their
13 official capacities within this District, pursuant to 28 USC § 1391.

14 **PARTIES**

15 6. Plaintiff Zachary Pilz, is an employee of Washington State Department of Children,
16 Youth & Families, residing in Lewis County.

17 7. Plaintiff Brenda Contine, is an employee of Washington State Department of
18 Corrections, residing in King County.

19 8. Plaintiff Aaron Keller, is an employee of Bellevue Fire Department, residing in
20 Snohomish County.

21 9. Plaintiff Adam Bogle, is an employee of Washington State Department of
22 Transportation, residing in Lincoln County.

23 10. Plaintiff Alex Carbajal, is an employee of Seattle Fire Department, residing in
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1 Snohomish County.

2 11. Plaintiff Alex Murillo, is an employee of Snohomish County District Court, residing in
3 Snohomish County.

4 12. Plaintiff Amber Roskamp, is an employee of Port Angeles School District, residing in
5 Clallam County.

6 13. Plaintiff Anna Trawczynski, is an employee of University of Washington Medicine -
7 Northwest, residing in King County.

8 14. Plaintiff Benjamin Swenson, is an employee of Washington State Department of
9 Children, Youth & Families, residing in Lewis County.

10 15. Plaintiff Blaine Schiess, is an employee of Washington State Department of
11 Transportation, residing in Clallam County.

12 16. Plaintiff Branon Snyder, is an employee of Seattle Fire Department, residing in Pierce
13 County.

14 17. Plaintiff Brian Paterik, is an employee of Seattle Fire Department, residing in Pierce
15 County.

16 18. Plaintiff Candace Kennedy, is an employee of Washington State Department of Social
17 and Health Services, residing in Thurston County.

18 19. Plaintiff Cathy Beckner, is an employee of Washington State Ferries, residing in Pierce
19 County.

20 20. Plaintiff Daniel Little, is an employee of Washington State Ferries, residing in
21 Snohomish County.

22 21. Plaintiff David Dahlin, is an employee of Seattle Fire Department, residing in
23 Snohomish County.

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1 22. Plaintiff David Lawton, is an employee of Washington State Ferries, residing in King
2 County.

3 23. Plaintiff David Taylor, is an employee of Washington State Department of
4 Transportation, residing in Yakima County.

5 24. Plaintiff David Walters, is an employee of Seattle Fire Department, residing in Pierce
6 County.

7 25. Plaintiff Dawn Andersen, is an employee of Mukilteo School District, residing in
8 Snohomish County.

9 26. Plaintiff Garrett Raulston, is an employee of Washington State Department of
10 Enterprise Services, residing in Spokane County.

11 27. Plaintiff Gwendolyn Auman, is an employee of Washington State Department of
12 Corrections, residing in Grays Harbor County.

13 28. Plaintiff Haleigh See, is an employee of Naselle Grays River Valley School District,
14 residing in Pacific County.

15 29. Plaintiff Heather Swensen, is an employee of Puget Sound Assistant Living, residing
16 in Pierce County.

17 30. Plaintiff Heriberto Mendoza, is an employee of Washington State Department of
18 Corrections, residing in Benton County.

19 31. Plaintiff Holly Verner, is an employee of Dermatology of Seattle, residing in King
20 County.

21 32. Plaintiff Jaime Kellogg, is an employee of Cardiac Study Center MultiCare, residing
22 in Spokane County.

23 33. Plaintiff James Palmer, is an employee of Washington State Department of
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1 Corrections, residing in Snohomish County.

2 34. Plaintiff Jeffrey Cowgill, is an employee of Washington State Department of
3 Agriculture, residing in Cowlitz County.

4 35. Plaintiff Jeni Venables, is an employee of Healthcare, residing in Thurston County.

5 36. Plaintiff Jennifer Barnes, is an employee of Washington State Department of Social
6 and Health Services, residing in Pierce County.

7 37. Plaintiff Jennifer Templeton, is an employee of Washington State Department of Social
8 and Health Services, residing in Pierce County.

9 38. Plaintiff Jennifer Zehrung, is an employee of Olympic Education District 14, residing
10 in Pierce County.

11 39. Plaintiff Jesse Gorham, is an employee of Seattle Fire Department, residing in King
12 County.

13 40. Plaintiff Jodie Dewey, is an employee of Washington State Patrol, residing in Spokane
14 County.

15 41. Plaintiff Joe DeGroat, is an employee of Washington State Department of
16 Transportation, residing in Yakima County.

17 42. Plaintiff Jonah Kuhn, is an employee of Washington State Department of Enterprise
18 Services, residing in Spokane County.

19 43. Plaintiff Josephine Swenson, is an employee of Washington State Department of
20 Children, Youth & Families, residing in Lewis County.

21 44. Plaintiff Josh Gibbs, is an employee of Seattle Fire Department, residing in Snohomish
22 County.

23 45. Plaintiff Judy Carpenter-Ross, is an employee of Washington State Department of
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