1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 WESTERN DISTRICT OF WASHINGTON 9 AT SEATTLE 10 THE HUMAN RIGHTS DEFENSE CENTER and MICHELLE DILLON, No. 11 **COMPLAINT** Plaintiffs, 12 v. 13 U.S. DEPARTMENT OF HEALTH AND 14 HUMAN SERVICES, ADMINISTRATION FOR CHILDREN AND FAMILIES, and 15 OFFICE OF REFUGEE RESETTLEMENT, 16 Defendants. 17 18 1. This lawsuit is an action under the Freedom of Information Act, 5 U.S.C. 19 § 552, et seq., seeking production of records responsive to requests submitted by 20 Ms. Michelle Dillon, an employee of the Human Rights Defense Center, to the U.S. 21 Department of Health and Human Services and to the Office of Refugee Resettlement, an 22 office within the Administration for Children and Families. 23 **JURISDICTION AND VENUE** 24 2. This Court has both subject matter jurisdiction over this action and personal 25 jurisdiction over the defendants under 5 U.S.C. §§ 552(a)(4)(B) and 2201(a). 26

3. Venue is appropriate in this Court under 5 U.S.C. § 552(a)(4)(B). Intradistrict assignment to the Seattle Division of the Western District of Washington is appropriate under LCR 3(e)(1) because the claims asserted herein arose in King County.

#### **PARTIES**

- 4. Plaintiff Human Rights Defense Center is a non-profit organization that advocates on behalf of the human rights of people held in U.S. detention facilities. Its advocacy efforts include publishing *Prison Legal News*, a 72-page monthly publication that covers prison-related news and litigation nationwide, and *Criminal Legal News*, a monthly publication that covers the criminal justice system beyond incarceration. The Human Rights Defense Center also publishes and distributes self-help reference books for prisoners, and engages in litigation, media campaigns and outreach, public speaking and education, and testimony before legislative and regulatory bodies.
- 5. Plaintiff Michelle Dillon resides in the Western District of Washington. She is an employee of the Human Rights Defense Center in its Seattle office.
- 6. Defendant U.S. Department of Health of Human Services is a department of the executive branch of the U.S. government and is an agency within the meaning of 5 U.S.C. § 552(f)(1) and 5 U.S.C. § 701.
- 7. Defendant Administration for Children and Families is a division of the U.S. Department of Health of Human Services and is an agency under 5 U.S.C. § 552(f)(1) and 5 U.S.C. § 701.
- 8. Defendant Office of Refugee Resettlement is an office of the U.S. Department of Health of Human Services and is an agency under 5 U.S.C. § 552(f)(1) and 5 U.S.C. § 701.

T 206.516.3800 F 206.516.3888

1		FACTS
2		Human Rights Defense Center's Background and Mission
3	9.	The Human Rights Defense Center was founded in 1990. It is dedicated to
4	public educat	ion, prisoner education, advocacy, and outreach to support the rights of
5	prisoners and	to further basic human rights.
6	10.	The Human Rights Defense Center's publishing project distributes books to
7	prisoners and	other customers. It also publishes two monthly magazines, Criminal Legal
8	News and Pri	son Legal News.
9	11.	In addition to publishing, the Human Rights Defense Center engages in
10	advocacy and	l education.
11	12.	Prior to a 2009 name change, the entire organization was known as
12	Prisoners' Le	gal News.
13		U.S. Department of Health and Human Services
14	13.	The U.S. Department of Health and Human Services ("HHS") has a mission
15	to enhance an	nd protect the health and well-being of all Americans.
16		Administration for Children and Families
ı7	14.	The Administration for Children and Families is a division within HHS.
18		Office of Refugee Resettlement
19	15.	The Office of Refugee Resettlement ("ORR") is an office within the
20	Administration	on for Children and Families.
21	16.	ORR has responsibility for non-citizen children who arrive in the United
22	States unacco	ompanied.
23	17.	ORR also takes responsibility for non-citizen children who have been
24	forcibly separ	rated from the adults with whom they arrived in the United States.
25	18.	The mistreatment of these children has been widely covered in the media.
26	For example:	
11		

1	Ginger Thompson, Listen to Children Who've Just Been Separated
2	From Their Parents at the Border,
3	https://www.propublica.org/article/children-separated-from-parents-
4	border-patrol-cbp-trump-immigration-policy;
5	NBC29, Young Immigrants Detained in Shenandoah Valley Juvenile
6	Center Allege Abuse, <a href="http://www.nbc29.com/story/38475890/young-">http://www.nbc29.com/story/38475890/young-</a>
7	immigrants-detained-in-virginia-center-allege-abuse;
8	Bree Burkitt, Ex-Migrant Shelter Employee Found Guilty of
9	Molesting Unaccompanied Minors,
10	https://www.usatoday.com/story/news/nation-
11	now/2018/09/11/southwest-key-worker-convicted-abusing-minors-
12	arizona-migrant-shelter/1267100002/.
13	19. Because of the widespread concern, the Human Rights Defense Center is
14	interested in documents regarding the potential ill treatment of children and other civil
15	rights violations.
16	The Requests for Information at Issue
17	20. On August 20, 2018, Ms. Dillon sent a request via web portal to HHS for
18	certain records related to litigation that the agency has resolved.
19	21. On behalf of the Human Rights Defense Center, Ms. Dillon requested
20	records regarding litigation against HHS and its employees or agents created since
21	January 1, 2010. She limited her request to claims and cases in which the government paid
22	\$1,000 or more.
23	22. In each case or claim described above, she asked to be provided:
24	The Complaint or Claim Form and any amended versions;
25	The Verdict Form, Final Judgment, Settlement Agreement, Consent
26	Decree, or other paper that resolved the case;
1	

1	A record that shows the amount of money involved in the resolution
2	and to whom it was paid.
3	23. Ms. Dillon also requested a fee waiver under 5 U.S.C. §§ 552(a)(4)(A)(ii)(II)
4	and (iii).
5	24. Via immediate acknowledgement email, HHS informed Ms. Dillon that her
6	request was assigned Request Number 2018-01423-FOIA-OS.
7	25. Although HHS did not ever invoke the agency's right to ten-day extension
8	under 5 U.S.C. § 552(a)(6)(B), as of the date of this filing, HHS's web portal simply shows
9	that this request is "Assigned for Processing."
10	26. As of the date of this filing, HHS has not provided any further response.
11	27. Also, on August 20, 2018, Ms. Dillon sent a request to the Office of Refugee
12	Resettlement of the Administration for Children and Families via email address
13	FOIA@acf.hhs.gov requesting all emails, including attachments, sent from ORR-authorized
14	care providers which include a Sexual Abuse/Significant Incident Report (SA/SIR) since
15	January 1, 2015 to any of the following email addresses:
16	VCACU_ORR_Reporting@ic.fbi.gov
17	• UAC@oig.hhs.gov
18	PSAC@acf.hhs.gov
19	Hotline@oig@dhs.gov
20	CRCLCompliance@hq.dhs.gov
21	• ERO.SexualAssault@ice.dhs.gov
22	PDOTASKING@cbp.dhs.gov
23	28. Ms. Dillon also requested a fee waiver under 5 U.S.C. §§ 552(a)(4)(A)(ii)(II)
24	and (iii).
25	29. As of the date of this filing, no response of any kind has been received.
26	

1	30. Per 5 U.S.C. § 552(a)(6)(A)(ii), any agency has twenty working days to
2	provide documents in response to a FOIA request.
3	31. For both requests, this period expired on September 18, 2018.
4	THE HUMAN RIGHTS DEFENSE CENTER AND MS. DILLON'S
5	CLAIMS FOR RELIEF
6	COUNT I:
7	Violation of the Freedom of Information Act, 5 U.S.C. § 552
8	32. This claim incorporates paragraphs $1 - 30$ by reference.
9	33. HHS, The Administration for Children and Families, and ORR wrongly
10	withheld documents responsive to the properly submitted requests.
11	34. The Human Rights Defense Center and Ms. Dillon have a statutory right to
12	all the records sought, and there is no basis to withhold them.
13	35. By failing to release all the records specifically requested, HHS, The
14	Administration for Children and Families, and ORR have violated the Freedom of
15	Information Act.
16	COUNT II:
17	Violation of the Freedom of Information Act Fee Waiver Provisions
18	36. This claim incorporates paragraphs $1 - 30$ by reference.
19	37. HHS, The Administration for Children and Families, and ORR wrongly did
20	not grant Ms. Dillon's request for a full fee waiver.
21	38. The Human Rights Defense Center and Ms. Dillon have a statutory right to a
22	full fee waiver.
23	39. By failing to grant a fee waiver, HHS, The Administration for Children and
24	Families, and ORR have violated the Freedom of Information Act.
25	
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l	

1		REQUESTED RE	LIEF	
2	The Human Rights Defense Center and Ms. Dillon therefore respectfully request			
3	that this Cou	urt:		
4	1.	Declare that the records they seek are	subject to disclosure under the	
5	Freedom of	Information Act;		
6	2.	Declare that they are entitled to a full	fee waiver;	
7	3.	Order HHS, The Administration for F	families and Children, and ORR to	
8	disclose the	requested records;		
9	4.	Award costs and attorneys' fees under	r 5 U.S.C. § 552(a)(4)(E); and	
10	5.	Grant such other relief as the Court m	ay consider just and proper.	
11				
12	Date	ed: October 1, 2018.		
13		Respect	tfully submitted,	
14		YARM	TUTH WILSDON PLLC	
15		By: <u>s/J</u>	eremy E. Roller	
16			E. Roller, WSBA #32021 fth Avenue, Suite 1400	
17		Seattle,	WA 98101 one (206) 516-3800	
18		Fax (20	96) 516-3888 yarmuth.com	
19		•		
20		to be	h M. Golden ( <i>pro hac vice</i> application e filed)	
21		316 F S	Rights Defense Center treet, NE #107	
22			gton, DC 20002 one (202) 543-8100	
23		dgolder	n@humanrightsdefensecenter.org	
24			ys for Plaintiffs The Human Rights Center and Michelle Dillon	
25		Dejense	Comer and monent Duron	
26				
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# Case 2:18-cv-01442-JLP Decument 1-1 Filed 10/01/18 Page 1 of 2

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as

provided by local rules of court purpose of initiating the civil do	. This form, approved by tocket sheet. (SEE INSTRUC	he Judicial Conference of TIONS ON NEXT PAGE O	of the Uni	ted States in September (PRM.)	r 1974, is requi	ired for the use of	the Clerk of Co	ourt for th	e e
I. (a) PLAINTIFFS THE HUMAN RIGHTS D	EFENSE CENTER ar	nd MICHELLE DILL	ON	DEFENDANT U.S. DEPARTME ADMINISTRATION OF REFUGEE R	ENT OF HEADN FOR CH	ILDREN AND			FICE
(b) County of Residence o	f First Listed Plaintiff <u>k</u> KCEPT IN U.S. PLAINTIFF CA	King ASES)			(IN U.S. P.	LAINTIFF CASES O. ON CASES, USE TH		OF	
(c) Attorneys (Firm Name, A Jeremy E. Roller / YARM 1420 Fifth Avenue, Suite (206) 516-3800	UTH WILSDON PLLO			Attorneys (If Known	n)				
II. BASIS OF JURISDI	CTION (Place an "X" in C	One Box Only)		TIZENSHIP OF		L PARTIES		-	
□ 1 U.S. Government Plaintiff	☐ 3 Federal Question (U.S. Government	Not a Party)			) PTF DEF □ 1 □ 1	Incorporated or Pri		or Defenda PTF □ 4	nt) DEF □ 4
¥ 2 U.S. Government Defendant	☐ 4 Diversity (Indicate Citizensh	ip of Parties in Item III)	Citize	en of Another State		Incorporated and P of Business In A		<b>5</b>	□ 5
				en or Subject of a reign Country	<b>3 3</b>	Foreign Nation		□ 6	□ 6
IV. NATURE OF SUIT		nly) DRTS	FO	ORFEITURE/PENALTY		for: Nature of Sui		tions. STATUTI	es l
□ 110 Insurance □ 120 Marine □ 130 Miller Act □ 140 Negotiable Instrument □ 150 Recovery of Overpayment	PERSONAL INJURY  310 Airplane 315 Airplane Product Liability 320 Assault, Libel & Slander 330 Federal Employers' Liability 340 Marine 345 Marine Product Liability 350 Motor Vehicle Product Liability 350 Motor Vehicle Product Liability 360 Other Personal Injury 362 Personal Injury Medical Malpractice CIVIL RIGHTS 440 Other Civil Rights 441 Voting 442 Employment 443 Housing/ Accommodations 445 Amer. w/Disabilities - Employment 446 Amer. w/Disabilities - Other 448 Education	PERSONAL INJUR  365 Personal Injury - Product Liability  367 Health Care/ Pharmaceutical Personal Injury Product Liability  368 Asbestos Personal Injury Product Liability  PERSONAL PROPER  370 Other Fraud  371 Truth in Lending  380 Other Personal Property Damage  70 1855 Property Damage  70 1855 Product Liability  PRISONER PETITION  Habeas Corpus:  463 Alien Detainee  510 Motions to Vacate Sentence  530 General  535 Death Penalty  Other:	Y	15 Drug Related Seizure of Property 21 USC 881 00 Other  LABOR 0 Fair Labor Standards Act 00 Labor/Management Relations 00 Railway Labor Act 11 Family and Medical Leave Act 10 Other Labor Litigation 11 Employee Retirement 11 Income Security Act 12 MMIGRATION 12 Naturalization Application 15 Other Immigration 16 Other Immigration 17 Naturalization Application 18 Naturalization Application 19 Other Immigration 19 Naturalization Application 19 Naturalization	422 Appe   423 With 28 U   PROPEI   820 Copy   830 Pater   840 Trade   861 HIA   862 Black   863 DIW   864 SSID   865 RSI (   FEDER/   870 Taxes or D.   871 IRS— 26 U	al 28 USC 158 drawal (SC 157  RTY RIGHTS rrights at emark  SECURITY (1395ff) a Lung (923) C/DIWW (405(g)) Title XVI 405(g))  AL TAX SUITS s (U.S. Plaintiff efendant)	375 False C	laims Act n (31 USC )) eapportions st und Bankin erce ution eer Influenc Organizat neer Credit tat TV tes/Commo uge tatutory Ac tural Acts mental Me n of Inforn strative Pre view or Ap Decision utionality of	ment g ced and ions dities/ cetions atters nation occdure
	court 3  Cite the U.S. Civil Star  5 U.S.C. § 552	Appellate Court	Reoj	(specij	her District	☐ 6 Multidistri Litigation Transfer		Multidist Litigation Direct Fi	n -
VII. REQUESTED IN	Freedom of Infor	mation Act case se		cords EMAND \$	C	HECK YES only	if demanded in	complair	nt:
<b>COMPLAINT:</b>	UNDER RULE 2					URY DEMAND:		XNo	
VIII. RELATED CASE IF ANY	(See instructions):	JUDGE	TODNEY	DE DECORD	DOCKE	T NUMBER			
DATE 10/01/2018		signature of at s/Jeremy E. Ro		JF KECUKD					
FOR OFFICE USE ONLY  RECEIPT # AM	MOUNT	APPLYING IFP		JUDGE		MAG. JUI	)GE		

#### INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- Plaintiffs-Defendants. Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- Jurisdiction. The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" II. in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.

United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.

Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.

Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; NOTE: federal question actions take precedence over diversity cases.)

- III. Residence (citizenship) of Principal Parties. This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- Nature of Suit. Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code IV. that is most applicable. Click here for: Nature of Suit Code Descriptions.
- **Origin.** Place an "X" in one of the seven boxes. V.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.

Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date. Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation - Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.

Multidistrict Litigation - Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket. PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statue.

- VI. Cause of Action. Report the civil statute directly related to the cause of action and give a brief description of the cause. Do not cite jurisdictional statutes unless diversity. Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- Requested in Complaint. Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P. Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction. Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases. This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.

# UNITED STATES DISTRICT COURT

for the

Western District of Washington

THE HUMAN RIGHTS DEFENSE CENTER and MICHELLE DILLON,	) ) ) )
Plaintiff(s)	)
V.	Civil Action No.
U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES, ADMINISTRATION FOR CHILDREN AND FAMILIES, and OFFICE OF REFUGEE RESETTLEMENT,	
Defendant(s)	)
SUMMONS	IN A CIVIL ACTION
To: (Defendant's name and address) U.S. DEPARTMENT OF c/o Office of the General U.S. Department of Heat 200 Independence Ave Washington, DC 20201	al Counsel alth and Human Services
A lawsuit has been filed against you.	
are the United States or a United States agency, or an of P. 12 (a)(2) or (3) — you must serve on the plaintiff an	n you (not counting the day you received it) — or 60 days if you fficer or employee of the United States described in Fed. R. Civ. answer to the attached complaint or a motion under Rule 12 of otion must be served on the plaintiff or plaintiff's attorney,
Jeremy E. Roller	
Yarmuth Wilsdon PLLC 1420 Fifth Avenue, Suit Seattle, WA 98101 (206) 516-3800	
If you fail to respond, judgment by default will You also must file your answer or motion with the cour	be entered against you for the relief demanded in the complaint. t.
	CLERK OF COURT
D	
Date:	Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No.

### PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

	This summons for (name	e of individual and title, if any)			
was rec	ceived by me on (date)	·			
	☐ I personally served t	the summons on the individua	l at (place)		
			on (date)	; or	
	☐ I left the summons a	at the individual's residence of	r usual place of abode with (name)		
			son of suitable age and discretion who res	sides there,	
	on (date)	, and mailed a copy t	o the individual's last known address; or		
	☐ I served the summon		1.16.6	, who is	
	designated by law to a	ccept service of process on be	chalf of (name of organization) on (date)	; or	
	☐ I returned the summ	ons unexecuted because		; or	
	☐ Other ( <i>specify</i> ):				
	My fees are \$	for travel and \$	for services, for a total of \$	0.00	
	I declare under penalty	of perjury that this information	on is true.		
Date:					
			Server's signature		
			Printed name and title		
			Server's address		

Additional information regarding attempted service, etc:

# UNITED STATES DISTRICT COURT

for the

Western District of Washington

THE HUMAN RIGHTS DEFENSE CENTER and MICHELLE DILLON,	) ) )	
Plaintiff(s)	)	
V.	Civil Action No.	
U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES, ADMINISTRATION FOR CHILDREN AND FAMILIES, and OFFICE OF REFUGEE RESETTLEMENT,	) ) ) )	
Defendant(s)	)	
SUMMONS IN A	A CIVIL ACTION	
To: (Defendant's name and address) ADMINISTRATION FOR CHILDREN AND FAMILIES c/o Office of the General Counsel U.S. Department of Health and Human Services 200 Independence Avenue SW Washington, DC 20201		
A lawsuit has been filed against you.		
Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:  Jeremy E. Roller  Yarmuth Wilsdon PLLC  1420 Fifth Avenue, Suite 1400  Seattle, WA 98101		
(206) 516-3800		
If you fail to respond, judgment by default will be e You also must file your answer or motion with the court.	entered against you for the relief demanded in the complaint.	
	CLERK OF COURT	
Data		
Date:	Signature of Clerk or Deputy Clerk	

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

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	This summons for (name	e of individual and title, if any)			
was rec	ceived by me on (date)	·			
	☐ I personally served t	the summons on the individua	l at (place)		
			on (date)	; or	
	☐ I left the summons a	at the individual's residence of	r usual place of abode with (name)		
			son of suitable age and discretion who res	sides there,	
	on (date)	, and mailed a copy t	o the individual's last known address; or		
	☐ I served the summon		1.16.6	, who is	
	designated by law to a	ccept service of process on be	chalf of (name of organization) on (date)	; or	
	☐ I returned the summ	ons unexecuted because		; or	
	☐ Other ( <i>specify</i> ):				
	My fees are \$	for travel and \$	for services, for a total of \$	0.00	
	I declare under penalty	of perjury that this information	on is true.		
Date:					
			Server's signature		
			Printed name and title		
			Server's address		

Additional information regarding attempted service, etc:

# UNITED STATES DISTRICT COURT

for the

Western District of Washington

Plaintiff(s) v. Civil Action No.  U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES, ADMINISTRATION FOR CHILDREN AND FAMILLES, and OFFICE OF REFUGEE RESETTLEMENT, Defendant(s)  SUMMONS IN A CIVIL ACTION  To: (Defendant's name and address) OFFICE OF REFUGEE RESETTLEMENT clo Office of the General Counsel U.S. Department of Health and Human Services 200 Independence Avenue SW Washington, DC 20201  A lawsuit has been filed against you.  Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:  Jeremy E. Roller Yarmuth Wildson PLLC 1420 Fifth Avenue, Suite 1400 Seattle, WA 98101 (206) 516-3800  If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.  CLERK OF COURT  Date:  Signature of Clerk or Deputy Clerk	THE HUMAN RIGHTS DEFENSE CENTER and MICHELLE DILLON,	) ) )
V. Civil Action No.  U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES, ADMINISTRATION FOR CHILDREN AND FAMILES, and OFFICE OF REFUGEE RESETTLEMENT.  Defendant(s)  SUMMONS IN A CIVIL ACTION  To: (Defendant's name and address) OFFICE OF REFUGEE RESETTLEMENT clo Office of the General Counsel U.S. Department of Health and Human Services 200 Independence Avenue SW Washington, DC 20201  A lawsuit has been filed against you.  Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:  Jeremy E. Roller Yarmuth Wilsdon PLLC 1420 Fifth Avenue, Suite 1400 Seattle, WA 98101 (206) 516-3800  If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.  CLERK OF COURT  Date:	Plaintiff(s)	Ć
SERVICES, ADMINISTRATION FOR CHILDREN AND FAMILIES, and OFFICE OF REFUGEE RESETTLEMENT,  Defendant(s)  SUMMONS IN A CIVIL ACTION  To: (Defendant's name and address) OFFICE OF REFUGEE RESETTLEMENT clo Office of the General Counsel U.S. Department of Health and Human Services 200 Independence Avenue SW Washington, DC 20201  A lawsuit has been filed against you.  Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:  Jeremy E. Roller Yarmuth Wilsdon PLLC 1420 Fifth Avenue, Suite 1400 Seattle, WA 98101 (206) 516-3800  If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.  CLERK OF COURT  Date:		Civil Action No.
SUMMONS IN A CIVIL ACTION  To: (Defendant's name and address) OFFICE OF REFUGEE RESETTLEMENT c/o Office of the General Counsel U.S. Department of Health and Human Services 200 Independence Avenue SW Washington, DC 20201  A lawsuit has been filed against you.  Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:  Jeremy E. Roller Yarmuth Wilsdon PLLC 1420 Fifth Avenue, Suite 1400 Seattle, WA 98101 (206) 516-3800  If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.  CLERK OF COURT  Date:	SERVICES, ADMINISTRATION FOR CHILDREN AND FAMILIES, and OFFICE OF REFUGEE	) ) ) )
To: (Defendant's name and address) OFFICE OF REFUGEE RESETTLEMENT c/o Office of the General Counsel U.S. Department of Health and Human Services 200 Independence Avenue SW Washington, DC 20201  A lawsuit has been filed against you.  Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:  Jeremy E. Roller Yarmuth Wilsdon PLLC 1420 Fifth Avenue, Suite 1400 Seattle, WA 98101 (206) 516-3800  If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.  CLERK OF COURT  Date:	Defendant(s)	)
c/o Office of the General Counsel U.S. Department of Health and Human Services 200 Independence Avenue SW Washington, DC 20201  A lawsuit has been filed against you.  Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:  Jeremy E. Roller Yarmuth Wilsdon PLLC 1420 Fifth Avenue, Suite 1400 Seattle, WA 98101 (206) 516-3800  If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.  CLERK OF COURT  Date:	SUMMONS IN	A CIVIL ACTION
Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:    Jeremy E. Roller Yarmuth Wilsdon PLLC 1420 Fifth Avenue, Suite 1400 Seattle, WA 98101 (206) 516-3800	c/o Office of the General Co U.S. Department of Health 200 Independence Avenue	ounsel and Human Services
are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:  Jeremy E. Roller Yarmuth Wilsdon PLLC 1420 Fifth Avenue, Suite 1400 Seattle, WA 98101 (206) 516-3800  If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.  CLERK OF COURT  Date:	A lawsuit has been filed against you.	
Yarmuth Wilsdon PLLC 1420 Fifth Avenue, Suite 1400 Seattle, WA 98101 (206) 516-3800  If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.  CLERK OF COURT  Date:	are the United States or a United States agency, or an office P. 12 (a)(2) or (3) — you must serve on the plaintiff an ans the Federal Rules of Civil Procedure. The answer or motion	er or employee of the United States described in Fed. R. Civ. wer to the attached complaint or a motion under Rule 12 of
1420 Fifth Avenue, Suite 1400 Seattle, WA 98101 (206) 516-3800  If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.  CLERK OF COURT  Date:	·	
You also must file your answer or motion with the court.  CLERK OF COURT  Date:	1420 Fifth Avenue, Suite 14 Seattle, WA 98101	400
Date:		entered against you for the relief demanded in the complaint.
		CLERK OF COURT
	Dotai	
	Date.	Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No.

### PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

	This summons for (name	e of individual and title, if any)			
was rec	ceived by me on (date)	·			
	☐ I personally served t	the summons on the individua	l at (place)		
			on (date)	; or	
	☐ I left the summons a	at the individual's residence of	r usual place of abode with (name)		
			son of suitable age and discretion who res	sides there,	
	on (date)	, and mailed a copy t	o the individual's last known address; or		
	☐ I served the summon		1.16.6	, who is	
	designated by law to a	ccept service of process on be	chalf of (name of organization) on (date)	; or	
	☐ I returned the summ	ons unexecuted because		; or	
	☐ Other ( <i>specify</i> ):				
	My fees are \$	for travel and \$	for services, for a total of \$	0.00	
	I declare under penalty	of perjury that this information	on is true.		
Date:					
			Server's signature		
			Printed name and title		
			Server's address		

Additional information regarding attempted service, etc: