

The Honorable Marsha J. Pechman

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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

RYAN KARNOSKI, et al.,

Plaintiffs, and

STATE OF WASHINGTON,

Plaintiff-Intervenor,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

Case No. 2:17-cv-01297-MJP

**DECLARATION OF VANESSA
BARSANTI IN SUPPORT OF
PLAINTIFFS' REPLY IN SUPPORT OF
MOTION TO COMPEL DEFENDANTS
TO ADEQUATELY RESPOND TO
PLAINTIFFS' FIRST, SECOND, AND
THIRD SETS OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND
INTERROGATORIES**

NOTE ON MOTION CALENDAR:
August 30, 2019

1 I, Vanessa Barsanti, swear under penalty of perjury under the laws of the United States to
2 the following:

3 1. I am counsel of record for Plaintiffs in this action, am over the age of 18, and am
4 competent to be a witness. I make this declaration in support of Plaintiffs' Reply in Support of
5 Motion to Compel Defendants to Adequately Respond to Plaintiffs' First, Second, and Third Sets
6 of Requests for Production of Documents and Interrogatories based on facts within my personal
7 knowledge.

8 2. On August 15, 2019, Plaintiffs filed their Motion to Compel Defendants to
9 Adequately Respond to Plaintiffs' First, Second, and Third sets of Requests for Production of
10 Documents and Interrogatories (the "Motion").

11 3. On August 29, 2019, Defendants served their Objections, Responses, and
12 Supplemental Responses to Plaintiffs' First Set of Interrogatories to Secretary Esper and the
13 United States Department of Defense to Plaintiffs via email.

14 4. On August 29, 2019, later that same day, Defendants filed their Response to
15 Plaintiffs' Motion to Compel Further Discovery Responses (ECF 358) and the Declaration of
16 Andrew E. Carmichael in support of Defendants' Response. Dkt. Nos. 370 & 371. The
17 Declaration of Andrew E. Carmichael contained two exhibits: Exhibit A contained the
18 Declaration of Robert E. Easton in Support of Defendants' Response to Plaintiffs' Motion to
19 Compel (ECF 358), Dkt. No. 371-1, and Exhibit B contained Defendants' Objections,
20 Responses, and Supplemental Responses to Plaintiffs' First Set of Interrogatories to Secretary
21 Esper and the United States Department of Defense, Dkt. No. 373.

22 5. On August 30, 2019, Defendant Department of Defense served their Objections to
23 Plaintiffs' Second Set of Interrogatories to Secretary Esper and the United States Department of
24 Defense, a true and correct copy of which is attached hereto as Exhibit 1.

25 I declare under the penalty of perjury that the foregoing is true and correct.

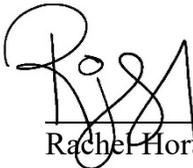
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27 DATED: September 4, 2019, 2019

s/ Vanessa Barsanti

Vanessa Barsanti

CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the United States of America and the laws of the State of Washington that all participants in the case are registered CM/ECF users and that service of the foregoing documents will be accomplished by the CM/ECF system on September 4, 2019.



Rachel Horvitz, WSBA No. 52987
rachel@newmanlaw.com
2101 Fourth Ave., Ste. 1500
Seattle, WA 98121
(206) 274-2800

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EXHIBIT 1

Filed Under Seal