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11  
12 **UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF WASHINGTON**  
13 **AT YAKIMA**

14 STATE OF WASHINGTON, et  
al.,

15 Plaintiffs,

16 v.

17 DONALD J. TRUMP, et al.,

18 Defendants.

NO. 1:20-cv-03127-SAB

DECLARATION OF ESTHER  
OKANLAWON IN SUPPORT  
OF PLAINTIFF STATES'  
MOTION FOR TEMPORARY  
RESTRAINING ORDER

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DECLARATION OF ESTHER  
OKANLAWON

ATTORNEY GENERAL OF WASHINGTON  
Complex Litigation Division  
800 5th Avenue, Suite 2000  
Seattle, WA 98104-3188  
(206) 464-7744

1 I, Esther Okanlawon, declare as follows:

2 1. I am over the age of 18, am competent to testify as to the matters  
3 herein, and make this declaration based on my personal knowledge.

4 2. I am a family nurse practitioner, serving patients in Colorado.

5 3. As a healthcare provider, our goal is to deliver treatment in a  
6 timely manner to alleviate the patient's symptoms.

7 4. While working on clinical rotations, I see patients who have been  
8 prescribed medications which are sent from Express Scripts through the mail.

9 5. Before July, medications usually were delivered to patients  
10 through the mail within seven days of receiving written prescriptions. In  
11 psychiatric care, we usually schedule patients to return for follow-up  
12 appointments four to five weeks later to see whether the medication is working.

13 6. Beginning around July 2020, I noticed that patients who were  
14 prescribed medication through Express Scripts experienced delays in receiving  
15 their medications through the mail.

16 7. Due to late deliveries through the mail, patients were returning to  
17 their follow-up appointment having used only about seven to eight days' worth  
18 of the medication.

19 8. Three to four patients experienced delivery delays of about 14 to  
20 21 days for medication through the mail.  
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22

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9. In psychiatric care, a delay in treatment usually leads to a delay in symptom relief.

10. Because of these mail delays, patients have had to schedule additional follow-up appointments because it typically takes about one month to determine if the psychiatric treatments are effective. Patients might need to take time off work to return for additional follow-up appointments.

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

DATED this 31<sup>st</sup> day of August, 2020, at Highlands Ranch, Colorado.



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ESTHER OKANLAWON  
Family Nurse Practitioner