

1 ROBERT W. FERGUSON  
*Attorney General*  
2 NOAH GUZZO PURCELL, WSBA #43492  
*Solicitor General*  
3 NATHAN K. BAYS, WSBA #43025  
KRISTIN BENESKI, WSBA #45478  
4 ANDREW R.W. HUGHES, WSBA #49515  
CRISTINA SEPE, WSBA #53609  
5 *(application for admission forthcoming)*  
*Assistant Attorneys General*  
6 EMMA GRUNBERG, WSBA #54659  
TERA M. HEINTZ, WSBA #54921  
7 *(application for admission forthcoming)*  
KARL D. SMITH, WSBA #41988  
8 *(application for admission forthcoming)*  
*Deputy Solicitors General*  
9 800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
10 (206) 464-7744

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

14 STATE OF WASHINGTON, et  
al.,  
15  
16 Plaintiffs,  
v.  
17 DONALD J. TRUMP, et al.,  
18 Defendants.

NO. 1:20-cv-03127-SAB

DECLARATION OF ZOË  
WILLIAMS IN SUPPORT OF  
PLAINTIFF STATES' MOTION  
FOR TEMPORARY  
RESTRAINING ORDER

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

I, Zoë Williams, declare as follows:

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

2. I am a nonprofit consultant in Denver, Colorado.

3. I am an independent contractor.

4. My clients pay me by check.

5. Recently, a client recently mailed me a check for three months of work. Despite being mailed from a Denver address, the check took about two weeks to arrive.

6. I had not previously experienced such delays.

7. I followed up with the client, and they confirmed that they had mailed the check on time.

8. Because of the delay in receiving the check, I was not able to pay a bill that was due.

9. The bill was sent to collections, and I received a notice that my credit score had changed.

10. Because the check was delayed, I was worried about being able to purchase groceries for my four children.

11. I ran out of money before the check arrived and was required to pay an overdraft fee to buy groceries.

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

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

DATED this 2nd day of September, 2020, at Denver, Colorado.

S/Zoë Williams

---

Zoë Williams