

The Honorable Judge Benjamin A. Settle

**UNITED STATES DISTRICT COURT  
WESTERN DIVISION OF WASHINGTON**

---

CLINT DIDIER, LISA THOMAS, TIM	)	<b>NO. 3:20-cv-5408</b>
EYMAN, LAWANDA JOY HATCH,	)	
DEAN WELLSFRY, PATTY DETRO,	)	DECLARATION OF
and JASON BERNICA, and OTHER	)	LAWANDA JOY HATCH
NONESSENTIAL WASHINGTONIANS	)	
SIMILARLY SITUATED,	)	
	)	
	)	
Plaintiffs,	)	
	)	
JAY INSLEE, in his capacity as Governor	)	
of the state of Washington,	)	
	)	
Defendant,	)	

---

**DECLARATION OF LAWANDA JOY HATCH**

I, LaWanda Joy Hatch, a plaintiff named in this case, on oath and subject to the laws of perjury in the state of Washington, being over 18 years of age and competent to testify to the matters set forth herein, now declare as follows:

DECLARATION OF LAWANDA JOY HATCH  
CASE NO.: 3:20-cv-5408

STEPHEN PIDGEON  
*Attorney at Law, P.S.*  
1523 132<sup>nd</sup> Street SE, Suite C350  
Everett, Washington 98208  
Stephen.pidgeon@comcast.net  
425-347-7513

1. My name is LaWanda Hatch. I am a wedding designer and planner for Cameo Heights Mansion.

2. At Cameo, we do not typically have large weddings and, in fact, my largest wedding there has been 75 persons. Cameo Heights Mansion is a bed and breakfast out in the middle of rural Washington in a place called Touchet. It is halfway between Pasco, and Walla Walla. Our indoor weddings are only up to 45 persons. However, they are very lucrative as I make 15-20% on each wedding and that includes all the décor, flowers, food, and other professional hires.

3. Although I do not have any employees, I create a lot of jobs for hair stylists, florists, photographers, D.J.'s, chefs, and bakeries, etc. Before all the lock down, I was having at least 5 inquiries a week on weddings for the summer months and throughout the year. As a wedding planner, we are really the canary in the coal mine. When times are good people want to marry and they want to have expensive celebrations. This year was starting out really exciting. I was so ready for the challenge to see how I could create masterpieces of memories for each bride and groom.

4. In the seven years I have been doing this, I have never had a bad review, even with the most challenging couple. It is because I love my work. I love to share my gifts and to make an income on it to help make our ends meet is really a joy. I had 9 weddings booked and a couple more pending for just the months of

April and May. I had several couples looking at June, but they had not yet booked. Since most of my weddings occur between April and October, I am not sure how we can meet our ends with this lock down and I have been reduced to a couple of elopements.

5. I did move a couple of my grander weddings to August, but with the governor's rumblings on extending the lock down, I may have to move them to next year, along with a couple more we had to move. Besides this being financially distressing, it has been emotionally devastating, as my couples are not just my clients, but they also become my friends. I really become emotionally attached to each of them, as I help them begin their lives together.

6. That all ended when our governor decided to shut down businesses by force, without any plan on how they could survive, without giving them an opportunity to show how they might be able to prevent the spread of the virus. He had ample opportunity to prepare for a pandemic as we have been told for years that one could hit our shores and each governor is supposed to have a plan at the ready. He did not.

7. It appears that Inslee believed it was possible to have a pandemic, as he signed into law just last year an expansion of his emergency powers. In fact, he hired, as his health secretary a man named John Weisman who declared as his goals his

desire to raise AIDS awareness and Climate Change. AIDS is something about which we are all aware, and no one can attribute any deaths to Climate Change in our state.

8. Inslee prepared nothing to keep us safe or prepared for a pandemic. He prepared nothing about to deal with the opioid crises in this state that has killed thousands of Washingtonians. It appears our governor's goal was nothing more than to expand his powers, but not to actually serve the citizens of our state.

9. Inslee claims he had to lock down Washington to save lives, yet, we knew from the beginning that it effected the elderly and infirmed the most. Out of all the states, with the King County cases and the horrific deaths in those nursing homes, he should have known that most of all. So, did he send his health secretary with a plan to protect the nursing and senior homes throughout the state? Did he lock them down, so outside guests could not spread the virus? Did he commission the creation of PPE's for the nursing homes to protect the staff? Did they create a plan on how each home should quarantine, clean, and prevent the viral spread throughout the facilities? No. They were not closed until the end of March. Almost 2 months too late. So, now, he expects all of that from places where the virus is not spreading to pay the price.

10. I am a part of a group where a private citizen ordered and paid for the materials to make face shields to protect the medical persons, doctors' offices, and

nursing homes. Our governor has not yet met a tax increase he has not loved, but he couldn't even provide materials to each county and instead requested citizens – many of whose livelihoods he terminated on his own order - to make them. As it is, I made 150 myself and the group made over 3.000 of them. We have given hundreds to nursing homes as late as the end of April.

11. Inslee has still not created a way to protect the health workers at these homes. All he has done with all his expanded powers, with all his tax dollars is to whine and complain, and destroy the livelihoods of honest, healthy, hardworking American citizens in Washington State.

12. In February I had a friend visit her 100-year old father-in-law that resides in a Benton County nursing home. They both came sick on the same day. He was tested and was positive. She was taken to the clinic where she exposed everyone there and they gave her prednisone and sent her home. Luckily, they both survived, but because the home was not locked down, it was spread. Then it was spread to the meat processor in Walla Walla County as the staff of many nursing homes here are married to workers at Tyson.

12. The data shows that where the outbreaks began and festered was not at salons, weddings, or restaurants. It was at nursing homes and from medical personnel. These are the places that should have had the strictest mitigation, but did not, because Inslee failed to act until it was too late.

13. So, we here are, in fact, feeling the effects of a governor that has his head in the clouds of climate change and ignored the happenings here on the ground, where the dangers really are - where the citizens live and work and where our freedoms and our constitutional rights to life, liberty, and the pursuit of happiness are being systematically taken away from us, because of his ineptitude. It cannot be borne.

14. We are not his subjects. We are citizens with our rights earned by the blood and sweat of some of my ancestors. They came on the Mayflower for freedom from a king. Yet here we are. In the very state named after a president that refused to be king. We now have a man that will be the sole decider when we get to be free. He in fact, is now a king.

15. My greatest anger is that I now fear my government more than the virus, and it is the government that should fear me. Fear that I will vote them out. Therefore, I am filing for those freedoms. For the elected to know who they are supposed to be working for - for my children, my grandchildren, and for all those that have died and suffered for those freedoms. Patrick Henry said it best, "Give me Freedom or Give Me death!", because without freedom, we have no life. No life, at all.

This is my declaration signed in \_\_\_\_\_ Washington, this \_\_\_\_ day of May 2020.

---

LaWanda Joy Hatch, Plaintiff

DECLARATION OF LAWANDA JOY HATCH  
CASE NO.: 3:20-cv-5408

STEPHEN PIDGEON  
*Attorney at Law, P.S.*  
1523 132<sup>nd</sup> Street SE, Suite C350  
Everett, Washington 98208  
Stephen.pidgeon@comcast.net  
425-347-7513

STATE OF WASHINGTON )  
 ) ss  
COUNTY OF BENTON )

On this day LaWanda Joy Hatch personally appeared before me; and is known to me to be the individual described in and who executed the foregoing instrument and acknowledged that it was signed as a free and voluntary act and deed, for the uses and purposes herein mentioned.

Given under my hand and official seal this \_\_\_\_\_ day of \_\_\_\_\_  
2020.

(Signature of officer and official seal)

\_\_\_\_\_  
(printed name)

\_\_\_\_\_  
Notary Public in and for the state of Washington

Residing at \_\_\_\_\_

My commission expires: \_\_\_\_\_