

The Honorable Kymberly K. Evanson

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

ABRAHAM FLAXMAN and AMY
HAGOPIAN, individually and for a
proposed class,

Plaintiffs,

v.

BOB FERGUSON, in his official
capacity as the Attorney General of the
State of Washington, and KATE
REYNOLDS, in her official capacity as
Executive Director of the Executive
Ethics Board of the State of Washington,

Defendants.

NO. 2:23-cv-01581-KKE

[PROPOSED] ORDER GRANTING
DEFENDANTS' MOTION TO
DISMISS

NOTE ON MOTION CALENDAR:
DECEMBER 1, 2023

Without Oral Argument

THIS MATTER came for hearing before the Court pursuant to Defendants Bob Ferguson and Kate Reynolds' Motion to Dismiss. The Court considered the records and files contained herein, including the following:

1. Defendants' Motion to Dismiss;
2. Plaintiffs' Response, if any;
3. Defendants' Reply in Support of Their Motion to Dismiss; and
4. The pleadings and records filed in this action

Based on the record and as being otherwise fully informed, NOW, THEREFORE, it is

1 hereby ORDERED that Defendants' Motion to Dismiss is GRANTED. Plaintiffs' claims
2 against Defendants Bob Ferguson and Kate Reynolds are dismissed with prejudice.

3 Further, the Court GRANTS Defendants' request for their reasonable fees and costs
4 incurred in bringing the Motion to Dismiss and Reply in Support of Motion to Dismiss.
5 Accordingly, Defendants are directed to file a motion for their reasonable fees and costs with
6 supporting factual information within 14 days of the issuance of this Order.

7 SIGNED this ____ day of _____ 2023.

8
9 HONORABLE KYMBERLY K. EVANSON

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11 Presented by:

12 ROBERT W. FERGUSON
13 Attorney General

14 /s/ Nathan K. Bays
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Kate Reynolds*

DECLARATION OF SERVICE

I hereby declare that on this day I caused the foregoing document to be electronically filed with the Clerk of the Court using the Court's CM/ECF System which will serve a copy of this document upon all counsel of record.

DATED this 9th day of November, 2023, at Seattle, Washington.

/s/ Nathan K. Bays

NATHAN K. BAYS, WSBA #43025

Assistant Attorney General