

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' RENEWED  
MOTION TO DISMISS

NOTE ON MOTION CALENDAR:  
JANUARY 5, 2023

Without Oral Argument

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

1. Defendants' Renewed Motion to Dismiss;
2. Plaintiffs' Response, if any;
3. Defendants' Reply in Support of Their Renewed 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 hereby ORDERED that Defendants' Renewed Motion to Dismiss is GRANTED. Plaintiffs' First

1 Amended Complaint and their claims against Defendants Bob Ferguson and Kate Reynolds are  
2 dismissed with prejudice.

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

8 SIGNED this \_\_\_\_\_ day of \_\_\_\_\_ 2024.

10 HONORABLE KYMBERLY K. EVANSON

12 Presented by:

13 ROBERT W. FERGUSON  
14 Attorney General

15 /s/ Nathan K. Bays  
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25 *Attorneys for Defendants Bob Ferguson and*  
26 *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 8th day of December 2023, at Seattle, Washington.

/s/ Nathan K. Bays

NATHAN K. BAYS, WSBA #43025

Assistant Attorney General