

THE HONORABLE SAMUEL CHUNG
Noted for Hearing: January 16, 2015
at 11 a.m.
With Oral Argument

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

JOHN DOE A, a minor by and through his
legal guardians RICHARD ROE and JANE
ROE, JOHN DOE B, and JOHN DOE J, as
individuals and on behalf of others similarly
situated,

Plaintiffs,

v.

KING COUNTY, a municipal organization, and
its departments KING COUNTY SHERIFF'S
OFFICE and KING COUNTY PROSECUTING
ATTORNEY'S OFFICE,

Defendants,

v.

DONNA ZINK, a married woman,

Requestor.

No. 14-2-30190-1 SEA

~~[PROPOSED] ORDER GRANTING
PLAINTIFF'S MOTION FOR CLASS
CERTIFICATION~~
PRELIMINARY INJUNCTION

1 JOHN DOE 2, a a married man, as an
2 individual and onbehalf of others similarly
3 situated,

3 Plaintiff,

4 v.

5 KING COUNTY, a municipal organization,
6 and its departments KING COUNTY
7 SHERIFF”S OFFICE and KING COUNTY
8 PROSECUTING ATTORNEY’S OFFICE,

8 Defendants,

9 v.

10 DONNA ZINK, a married woman,

11 Requestor.

14 BRANDON ZIMMERMAN,

15 Plaintiffs,

16 v.

17 KING COUNTY SHERIFF”S OFFICE,

18 Requestor.

21 THIS MATTER came before this Court on Plaintiff’s Motion for Preliminary Injunction,
22 as an individual and on behalf of others similarly situated.

23 Having considered Plaintiff’s motion and all pleadings submitted in support of and in
24 opposition to the motion, as well as the arguments of counsel for the defendant King County and
25 requestor Donna Zink, the Court FINDS:
26

[[PROPOSED] ORDER GRANTING PLAINTIFF’S MOTION FOR
PRELIMINARY INJUNCTION- -- 2

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1 1. Plaintiff and the proposed class have a clear legal and equitable right to enjoin
2 the release of the registration forms to the general public, as the disclosure would cause
3 immediate and irreparable harm and would not be in the public interest. Plaintiff and the
4 proposed class have shown a likelihood of prevailing on the merits of their claim.

5 2. Plaintiff and the proposed class have a clear legal and equitable right to enjoin
6 the release of the psychosexual evaluations to the general public, as the disclosure would cause
7 immediate and irreparable harm and would not be in the public interest. Plaintiff and the
8 proposed class have shown a likelihood of prevailing on the merits of their claim.
9

10 3. Plaintiff and the proposed class have a well-grounded fear of immediate invasion
11 of their rights. Plaintiff and the proposed class's ability to seek injunctive relief would be
12 meaningless if the records were released prior to a determination on the merits.

13 4. Plaintiff and the proposed class have shown the anticipated release would result
14 in substantial and irreparable injury.
15

16 The Court therefore ORDERS that a preliminary injunction is GRANTED. It is
17 ORDERED that King County is enjoined from disclosing any and all sex offender registration
18 forms for Level II and Level III sex offenders except as allowed after following the procedures
19 mandated by RCW 4.24.550, including a form-by-form, offender-by-offender review prior to
20 release. The Court further ORDERS that King County is enjoined from releasing any database
21 of information containing information from the registration forms that is not otherwise available
22 to the public. The Court further ORDERS that King County shall not release any psychosexual
23 evaluations to Ms. Zink during the pendency of this Order. This order remains effective until the
24 Court rules on the merits of Plaintiff's claims.
25

26 It is further ORDERED that there shall be no bond.

1
2 DONE IN OPEN COURT this 20 day of January, 2014⁵

3
4 By 
5 JUDGE/COURT COMMISSIONER

6 Samuel S. Chung

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