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SUPERIOR COURT OF THE STATE OF WASHINGTON  
KING COUNTY

SERVICE EMPLOYEES INTERNATIONAL )  
UNION 775, WASHINGTON PUBLIC )  
EMPLOYEES ASSOCIATION/UNITED FOOD )  
AND COMMERCIAL WORKERS LOCAL )  
365, SERVICE EMPLOYEES )  
INTERNATIONAL UNION LOCAL 925, )  
SERVICE EMPLOYEES INTERNATIONAL )  
UNION DISTRICT 1199NW, )  
INLANDBOATMEN'S UNION OF THE )  
PACIFIC/ILWU, UNITED FOOD AND )  
COMMERCIAL WORKERS LOCAL 21, and )  
WASHINGTON STATE NURSES )  
ASSOCIATION, )

No. 07-2-05431-6 SEA

DECLARATION OF DARLA  
JEAN BRANIFF IN SUPPORT OF  
EVERGREEN FREEDOM  
FOUNDATION'S OPPOSITION  
TO PLAINTIFFS' MOTION FOR  
SUMMARY JUDGMENT

Plaintiffs,

v.

STATE OF WASHINGTON, OFFICE OF  
FINANCIAL MANAGEMENT, and STEVE  
MCLAIN, Director of Labor Relations, in his  
official capacity,

Defendant.

Darla Jean Braniff declares and states as follows:

1. I am over the age of eighteen and competent to testify to the matters herein.
2. I am not a party to this action.
3. I am an employee at the Washington State Department of Labor and Industries. I

have been employed with the Washington State Department of Labor and Industries for over 25  
years and at my current position for over 6 years. I am a union member.

1           4.     I believe, both as a member of the public and as a state employee who is required  
2 to be represented by the union, I am absolutely entitled to have access to the proposals passed  
3 across the table and the notes kept by, and in the possession of the state, of the negotiation  
4 sessions. If the state released these documents to the public I would find them a valuable  
5 resource.

6           5.     I believe the General Government Collective Bargaining Agreements are public  
7 policy in that they determine the working conditions of a large percentage of state workers, they  
8 determine how state workers deliver their services to the people of Washington state, and they  
9 control how a significant portion of the state budget is spent.

10          6.     As a citizen and taxpayer of the state of Washington, I want to know the details of  
11 how contracts worth more than \$500 million were negotiated.

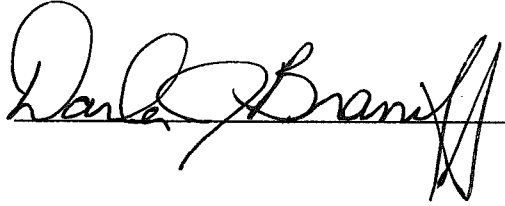
12          7.     As a state employee, I want to, and believe I have the right to know how the  
13 General Government Collective Bargaining Agreements are negotiated. These contracts  
14 determine my work environment and how I perform my responsibilities to the people of  
15 Washington. Currently, the union that represents me does not provide this information to me. If I  
16 am required to live by deals negotiated by my union, I should be entitled to see how they  
17 negotiated those deals.

18          8.     I believe this is true for all state workers, whether they want representation or not  
19 and whether they pay the union as members, as fee payers, or pay to a charity. When a union  
20 represents state employees, the employees should know exactly how they are being represented.

21          9.     In the past, I have considered participating in the collective bargaining process  
22 and, although I decided not to, the fear that my statements would be released to the public was  
23 not a part of my decision to not participate in negotiations. If I considered joining the negotiating  
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1 team again in the future, at this point in time, the fear that my statements would be released to  
2 the public still would play no role in my decision-making process.

3 Executed this 24<sup>th</sup> day of May, 2007, at Rochester, Washington.

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