

FILED  
SUPREME COURT  
STATE OF WASHINGTON  
6/23/2020 2:17 PM  
BY SUSAN L. CARLSON  
CLERK

No. 98633-9

SUPREME COURT OF THE STATE OF WASHINGTON

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UNEMPLOYMENT LAW PROJECT, et al.

Petitioners,

v.

SUZAN LEVINE, COMMISSIONER FOR THE WASHINGTON STATE EMPLOYMENT  
SECURITY DEPARTMENT,

Respondent.

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DECLARATION OF MICHAEL DEMADDALENA

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THE SHERIDAN LAW FIRM, P.S.

John P. Sheridan, WSBA #21473  
Mark W. Rose, WSBA #41916  
Andra Kranzler, WSBA # 44098  
Justin O. Abbasi, WSBA # 53582  
Hoge Building, Suite 1200  
705 Second Avenue  
Seattle, WA 98104  
(206) 381-5949

Attorneys for Petitioners

I, MICHAEL DEMADDALENA, make the following statement based on personal knowledge.

1. I am a resident of Seattle in King County, WA. I am currently homeless.

2. I am a cook. I work for Center Plate at T-Mobile Stadium for the Mariner's baseball season, March – October 2020 . I have worked for this this company since 2019. This is a seasonal position.

3. I applied for unemployment benefits on or about March 24, 2020. I have filed a weekly claim for the past 11 weeks.

4. On April 20, ESD asked me to update my contact information.

5. On April 29, I received a PUA monetary determination letter for \$9600.

6. On or about May 1, I received a monetary determination letter for my unemployment insurance benefits claim with an alternative base year.

7. On or about May 2, I received a notice reopening my claim for benefits.

8. On or about May 3, I received another notice stating that my initial claim was being backdated.

9. On or about May 16, ESD asked me to provide copies of my identification and social security card. I submitted copies of my Washington Identification and copy of my original social security card the same day by e-service. I got a confirmation that the documentation was received.

10. I was approved for standby on May 16, 2020.

11. I have claimed for 11 weeks and my status is noted as “disqualified.” I have not received any benefits to date.

12. I have attempted to contact ESD, at least five times a day every day since March. I have never gotten through to talk to a live person. There is no option to leave a message. I am eligible for the benefits that I have claimed.

13. The job options are limited during the pandemic because I am a cook. I was unable to pay my rent and I had to move out of my room rental six weeks ago. I am now residing in a tent on 2<sup>nd</sup> and Denny in Seattle. This has made my life miserable from top to bottom. I don’t have a home. I got bit by a spider and I was in the hospital for five days. Also, my important documentation and items have been stolen.

14. During the first week of June, ESD sent me a notice to appeal the determination that I am disqualified. I am appealing this denial.

15. On a scale of 1-10 my level of fear, anxiety and stress is at a 9. because I have not received any benefits. I am relying on ESD's prompt payment of benefits to buy clothes, shoes, and essentials to survive. I cannot go to a shelter because all of the shelters are on lock down due to the coronavirus. I cannot successfully secure safe housing.

16. It is very difficult to respond to requests for information, signatures and respond in general when the libraries are closed and one does not have access to electricity.

17. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

DATED this 11th day of June, 2020 in Seattle, Washington.

/s/  
MICHAEL DEMADDALENA



11. On a scale of 1 to 10 my level of fear, anxiety and stress is at  
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request my mom of Mexico to buy clothes, shoes, and essentials for  
myself. I cannot go to a shelter because all of the shelters are on lock  
down due to the coronavirus. I cannot successfully secure safe housing.

12. It is very difficult respond to requests for information,  
signatures and respond in general when the libraries are closed and one  
does not have access to electricity.

13. I declare under penalty of perjury under the laws of the  
State of Washington that the foregoing is true and correct to the best of my  
knowledge.

Executed this 11th day of June, 2020 in Seattle, Washington.

  
MIRIAM DEMAYALEÑA



**CERTIFICATE OF SERVICE**

I, Tony Dondero, certify under penalty of perjury under the laws of the State of Washington and the United States that, on June 23, 2020, I served the document to which this Certificate is attached to the party listed below in the manner shown.

ROBERT FERGUSON

Attorney General

Eric D. Peterson, WSBA #35555  
Senior Assistant Attorney General

Leah E. Harris, WSBA #40815  
Assistant Attorney General

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- |                                     |                              |
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| <input type="checkbox"/>            | By Legal Messenger           |
| <input type="checkbox"/>            | By Facsimile                 |
| <input type="checkbox"/>            | By Overnight Fed Ex Delivery |
| <input checked="" type="checkbox"/> | By Electronic Mail           |

Dated this 23rd day of June 2020.

*s/Tony Dondero*\_\_\_\_\_

Tony Dondero,  
Legal Assistant

**THE SHERIDAN LAW FIRM, P.S.**

**June 23, 2020 - 2:17 PM**

**Transmittal Information**

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 98633-9  
**Appellate Court Case Title:** Unemployment Law Project et al. v. Suzan Levine

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