

FILED  
SUPREME COURT  
STATE OF WASHINGTON  
6/23/2020 2:22 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 MIROSLAVA RADOVICH

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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, Miroslava Radovich, declare that the following statement is true and correct:

1. I am over the age of eighteen (18) and competent to make this declaration.

2. I am a resident of Everett in Snohomish County, WA.

3. I worked at University Mazda for one year as a title clerk.

4. I became unemployed on March 24, 2020.

5. I applied for unemployment benefits on March 24, 2020.

6. I received a Monetary Determination on March 31, 2020, entitling me to benefits.

7. The Employment Security Department (ESD) told me on June 1, 2020 that my weekly check is being withheld until I could verify my identity.

8. I have taken the following actions to address this issue with ESD: I have been calling ESD four days per week for about five hours per day. It takes hours to get through to anyone, and when I finally do, I am transferred or disconnected. I have tried sending messages through the SAW portal, but after four or five of them went unanswered I stopped sending messages that way. I turned to a Facebook support group for help and I have been calling and emailing any phone number or email address that comes up that might be able to help me. I faxed all of my identity

documents to ESD, but I have never gotten a response. I faxed them my passport, Social Security card, driver's license, and proof of naturalization. I also contacted the OSI in an attempt to resolve the identity and fraud issues that I have had to deal with. I was told I needed to file an appeal, so I did, but I never received any communication about my appeal or a hearing after that. My first language is Spanish, so I have also tried to call the Spanish language line at ESD.

9. I have been significantly and adversely affected in the following ways due to my not receiving my unemployment benefits: The lack of benefit payments have made me late in my payments for rent, my car, credit cards, and utilities. My car is in danger of being repossessed in the next 30 days if we cannot catch up on payments. I am down to \$25 in my account. The process has been psychologically draining, and it has been incredibly difficult to stay upbeat. I am often worried about the future to the point of tears.

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 7<sup>th</sup> day of June, 2020 in Everett, Washington.

/s/   
Miroslava Radovich

**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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- By United States Mail
- By Legal Messenger
- By Facsimile
- By Overnight Fed Ex Delivery
- 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 - 2:22 PM**

**Transmittal Information**

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

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