

FILED
SUPREME COURT
STATE OF WASHINGTON
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No. 98633-9

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

UNEMPLOYMENT LAW PROJECT,
MCKEEZI TAYLOR BARRAZA,
and MARIANNE WHITE,

Petitioners,

v.

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

Respondent.

**MOTION FOR LEAVE TO FILE BRIEF OF AMICI CURIAE
WASHINGTON STATE PSYCHOLOGICAL ASSOCIATION
IN SUPPORT OF PETITIONERS**

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INTRODUCTION

The Washington State Psychological Association (WSPA) seeks leave to file an amici curiae memorandum in support of the petitioners in this case. *See* RAP 10.6(a). Petitioners have consented to such filing. Respondent has not consented.

IDENTITY AND INTEREST OF *AMICI CURIAE*

The Washington State Psychological Association (“WSPA”) is a nonprofit scientific and professional organization founded in 1947. WSPA represents members and affiliates, including the majority of Washington psychologists holding doctoral degrees from accredited universities.

RCW 18.83.010(1) defines the “practice of psychology” to mean: the observation, evaluation, interpretation, and modification of human behavior by the application of psychological principles, methods, and procedures for the purposes of preventing or eliminating symptomatic or maladaptive behavior and promoting mental and behavioral health. As a result, the mission of WSPA is to support, promote and advance the education, science and practice of psychology in the public interest. Indeed, WSPA is recognized at the national level of psychology for its dedication to promoting the public interest.

Whenever WSPA attempts to promote the public interest, it relies upon the most recent scientific evidence to establish what actions would

erode the mental and behavioral health of Washington workers.

FAMILIARITY WITH ISSUES AND ARGUMENTS

Counsel for Amici have obtained copies of and are familiar with the briefing by the parties. Amici are familiar with the issues and arguments presented by the parties and will not unduly repeat them.

ISSUES TO BE ADDRESSED BY AMICI

WSPA is submitting an amicus curiae memorandum to show the likely harm to the mental and behavioral health that is being caused by the Employment Security Department (“ESD”) withholding unemployment benefits. As addressed in the petition for a writ of mandamus, through no fault of their own, claimants are being denied prompt benefits that they are statutorily due. ESD is failing thousands of Washington workers.

BRIEFING FROM AMICI WILL ASSIST THE COURT

WSPA wishes to assist this Court’s determination of whether to accept review and grant relief. Under RAP 10.6 such a filing is permitted. The memorandum explains the nature of scientific evidence and its presentation to the Court. Specifically, it surveys the effects of unemployment on people of color, homelessness, health insurance, mental health, and childhood development.

CONCLUSION

For the foregoing reasons, Amici respectfully request that the Court grant leave to file the Brief of Amici Curiae filed concurrently with this Motion.

DATED this 22nd day of June, 2020.

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Transmittal Information

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