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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

JAMIE ZIMMERMAN, et al,

Plaintiffs,

v.

PEACEHEALTH,

Defendants

CASE NO: 3:22-cv-05960

DECLARATION OF KATHERINE
TELFORD

I, Katherine Telford, declare as follows:

1. This Declaration is based upon personal knowledge and belief, and I am competent to testify to the information set forth herein.
2. I am over 18 years old.
3. I am from Whatcom County, Washington.
4. I worked at PeaceHealth from August 1997 until September 1, 2021, as a Registered Nurse. My yearly reviews were always positive.
5. I possess a Master’s in the Science of Nursing and held a certification in my area of expertise while working at PeaceHealth as a Registered Nurse.
6. In addition, I served PeaceHealth on my days off to improve PeaceHealth’s practices in various ways. I served on the Professional Practice Counsel and other leadership

DECLARATION

<p>Silent Majority Foundation 5238 Outlet Dr. Pasco, WA 99301</p>

1 committees. While serving, I helped write policies for St. Joseph's Medical Center.

2 Prior to the pandemic, I helped develop orientation materials for new employees.

3
4 7. Prior to the Pandemic I at times would take the flu vaccine if it had been shown to be
5 effective against the year's particular strain of the flu and if I was able to find a shot that
6 did not contain fetal cell components. Otherwise, I would not take the flu vaccine.

7
8 8. I never had to request an exemption for the flu shot. I simply was able to opt out of the
9 flu shot.

10
11 9. Once I opted out of taking the flu shot I was accommodated by wearing a surgical mask
12 and the appropriate PPE as required per specific disease processes per infection control
13 guidelines.

14
15 10. I worked throughout the pandemic using personal protection equipment, which included
16 PPE and hygienic practices as required for specific disease processes per infection
17 control guidelines.

18
19 11. On August 3, 2021, PeaceHealth announced they would be requiring vaccination against
20 COVID-19.

21
22 12. On August 8th I submitted a religious exemption request.

23
24 13. As part of my request, I was willing to adhere to the recommended personal protection
25 equipment wearing an N-95mask and adhering to infection control guidelines as
26 required per specific disease processes. This request was in alignment with PeaceHealth
27 masking policy for Covid 19.

28
29 14. On August 18, 2021, PeaceHealth informed me that my request for exemption from the
30 vaccine was approved.

1 15. The approved exemption notification letter stated, “if you currently work in a
2 PeaceHealth facility in any role, your supervisor with work with HR to determine if your
3 role can be performed 100% remotely or if there is another accommodation that can be
4 made”.

5
6 16. On August 19, 2021, I sent an email to my manager, Lisa Kelsey, and PeaceHealth’s
7 Human Resources to explore accommodating my exemption and requesting scientific
8 data showing that I am a health risk to “patients, caregivers, or other community
9 members”. This email was ignored.

10
11 17. On August 23, 2021, I wrote a letter of appeal to PeaceHealth Human Resources
12 regarding the decision to place me on leave of absence without pay. This email was
13 ignored.

14 18. On August 26, 2021, my manager, Lisa Kelsey requested I come to her office to meet
15 for what I thought was a discussion about possible accommodations to my approved
16 exemption. Instead, I was informed I would be placed on leave of absence beginning
17 September 1, 2021.

18
19 19. On August 26, 2021, I received a follow-up email from my manager, Lisa Kelsey stating
20 PeaceHealth required that I go on administrative leave beginning September 1, 2021,
21 and said I first had to use all my PTO and then would be on unpaid leave for an
22 undetermined time.

23
24 20. On September 02, 2021, I was locked out of my work email.

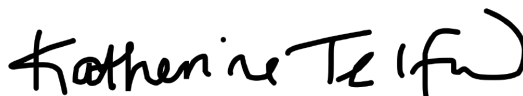
25 21. After my PTO ended, all benefits were also ended.

26 22. I am uncertain as to the date my leave of absence ended as I have never been officially
27 notified that my employment at PeaceHealth has been severed.
28

1 23. As a result of my leave of absence, I lost my home with a water view of Drayton Harbor.
2 I have had to move out of state and start over. I had to leave my family and people I
3 love and saw frequently, but now see very infrequently due to distance. This includes
4 my elderly mother who is declining in health; my grandson who is growing up not
5 knowing me; my daughters, one of whom I am the guardian. I can no longer perform
6 my duties of guardian as effectively as I was able to do before losing my job. I now
7 must rely upon my eldest daughter to fill in the gaps of care because I am 3,000 miles
8 away. The emotional pain I continue to suffer daily is immense. I have struggled to
9 secure a primary care doctor and dentist. I rely upon holistic approaches in caring for
10 my dental and physical needs. I have not been able to secure any dental services since
11 being placed on leave of absence. I fear I will lose my teeth.
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15 I SWEAR UNDER PENALTY PERJURY OF THE LAWS OF THE STATE OF
16 WASHINGTON THAT THE FOREGOING STATEMENT IS TRUE AND CORRECT TO THE
17 BEST OF MY KNOWLEDGE AND BELIEF.

18 DATED AT Charlotte, NC this 27th day of April 2024.

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20 

21 Katherine Telford
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DECLARATION

Silent Majority Foundation
5238 Outlet Dr.
Pasco, WA 99301