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The Honorable John C. Coughenour

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**UNITED STATES DISTRICT COURT**
**WESTERN DISTRICT OF WASHINGTON**

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**AT SEATTLE**

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WASHINGTON STATE REPUBLICAN
PARTY, et al.,

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Plaintiffs,

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WASHINGTON STATE DEMOCRATIC
CENTRAL COMMITTEE, et al.,

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Plaintiff-Intervenors,

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LIBERTARIAN PARTY OF WASHINGTON
STATE, et al.,

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Plaintiff-Intervenors,

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v.

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STATE OF WASHINGTON, et al.,

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Defendant-Intervenors,

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WASHINGTON STATE GRANGE,

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Defendant-Intervenors.

NO.  C05-0927-JCC

DECLARATION OF
COUNSEL IN SUPPORT OF
MOTION FOR SUMMARY
JUDGMENT

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DECLARATION OF COUNSEL IN
SUPPORT OF MOTION FOR
SUMMARY JUDGMENT
NO.  C05-0927-JCC

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1   I, Jeffrey T. Even, being first duly sworn upon oath, declare as follows:
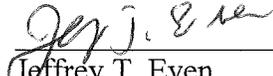
2   1. I am over eighteen years of age and competent to testify. I am an attorney

3   licensed to practice law in the state of Washington and admitted to the bar of this court.

4   I am currently employed as a Deputy Solicitor General for the state of Washington. I am

5   one of the counsel for Defendant-Intervenors State of Washington, Secretary of State Sam

6   Reed, and Attorney General Rob McKenna in this action.

7   2. Attached as exhibits to this Declaration are true and correct copies of the

8   following:

9   a.   The State's First Amended Complaint filed in state court in *State of*

10       *Washington ex rel. Public Disclosure Commission v. Washington State*

11       *Republican Party*, King County Superior Court No. 08-2-34030-9 SEA;

12   b.   Washington State Republican Party's Answer, Affirmative Defenses,

13       Counterclaims, and Third Party Complaint, filed in state court in *State of*

14       *Washington ex rel. Public Disclosure Commission v. Washington State*

15       *Republican Party*, King County Superior Court No. 08-2-34030-9 SEA;

16   c.   Order on Partial Summary Re: The "Rossi Mailings", in *State of Washington*

17       *ex rel. Public Disclosure Commission v. Washington State Republican Party*,

18       King County Superior Court No. 08-2-34030-9 SEA; and

19   d.   The emergency rule of the Public Disclosure Commission, codified at Wash.

20       Admin. Code 390-05-274, as published online in the Washington State

21       Register, WSR 10-12-114 (effective June 30, 2010), available online

22       at   http://apps.leg.wa.gov/documents/laws/wsr/2010/12/10-12-114.htm   (last

23       accessed July 18, 2010).

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1        3.   I swear under penalty of perjury under the laws of the state of Washington that

2    the foregoing is true and correct and of my own knowledge, and that I executed this

3    Declaration at Olympia, Washington, in the County of Thurston, this 26th day of August,

4    2010.

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6                                        Jeffrey T. Even

7                                        WSBA #20367

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DECLARATION OF COUNSEL IN          3
SUPPORT OF MOTION FOR
SUMMARY JUDGMENT
NO.  C05-0927-JCC