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THE HONORABLE JOHN E. BRIDGES

SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR CHELAN COUNTY

Timothy Borders et al.,

Petitioners,

v.

King County et al.,

Respondents,

and

Washington State Democratic Central
Committee,

Intervenor-Respondent.

NO. 05-2-00027-3

SUBPOENA DUCES TECUM TO KING
COUNTY

1 **TO: CUSTODIAN OF RECORDS, KING COUNTY**

2
3 **YOU ARE HEREBY COMMANDED** to appear at the offices of Perkins Coie LLP,
4
5 1201 Third Avenue, Suite 4800, Seattle, Washington 98101-3099, on Wednesday, April 20,
6
7 2005, commencing at the hour of 9:00 a.m., and then and there to testify as a witness at the
8
9 request of Intervenor-Respondent Washington State Democratic Central Committee in the
10
11 above-entitled cause, and to remain in attendance upon the undersigned or other Notary
12
13 Public until discharged; and to bring with you the following, preferably in electronic form:

14
15 1. Verified copy of the voter registration records for Thomas J. Harleman,
16
17 residing at address 24210 S.E. 203rd St., Maple Valley, WA 98038 with voter ID
18
19 880400568.

20
21 2. Verified copy of the voter registration records for Thomas J. Harleman,
22
23 residing at address 24210 S.E. 203rd St., Maple Valley, WA 98038 with voter ID
24
25 712220627.

26
27 **ALTERNATIVELY**, to avoid the necessity of a deposition, the documents may be
28
29 produced in the offices of Perkins Coie LLP, 1201 Third Avenue, Suite 4800, Seattle,
30
31 Washington 98101-3099, on the above-referenced date with a notarized declaration from the
32
33 Records Custodian in the form of the attached Exhibit A, attesting under penalty of perjury
34
35 that the enclosed documents are true and correct copies of all of the above-requested records
36
37 which were kept and maintained by King County in the usual course of business. If
38
39 testimony by declaration will be provided in lieu of deposition, please notify the
40
41 undersigned no later than Tuesday, April 19, 2005.

DATED: April 13, 2005.

PERKINS COIE LLP

By 

Kevin J. Hamilton, WSBA # 15648
William C. Rava, WSBA # 29948
1201 Third Avenue, Suite 4800
Seattle, WA 98101-3099

Attorneys for Intervenor-Respondent
Washington State Democratic Central
Committee

SPEIDEL LAW FIRM

Russell J. Speidel, WSBA # 12838
7 North Wenatchee Avenue, Suite 600
Wenatchee, WA 98807

JENNY A. DURKAN

Jenny A. Durkan, WSBA # 15751
c/o Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, WA 98101-3099

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EXHIBIT A

DECLARATION OF CUSTODIAN OF RECORDS

I, _____, being the duly authorized Custodian of Records, or other
qualified witness at:

say:

_____ That as of the date of this declaration, the attached documents are a true and complete copy of all records requested in the attached Subpoena Duces Tecum which were kept and maintained by King County in the usual course of regularly conducted business activity by King County, which had the regular practice of making and maintaining these records.

_____ That as of the date of this declaration, I have not supplied the complete records requested in the attached Subpoena Duces Tecum, and the following records have been omitted:

_____ That as of the date of this declaration, no records requested in the Subpoena Duces Tecum are in my possession.

I hereby certify and declare under the penalty of perjury under the laws of the State of Washington, that the foregoing is true and correct.

_____ [Print Name]