

1 the files and records herein, the civil rules for Superior Court for the State of
2 Washington, and other laws of the State of Washington.

3 1. Chelan County objects to Interrogatory No. 3(b) as it is unduly
4 overburdensome in terms of cost, personnel, resources, and time to respond. Further, it
5 requests irrelevant information, information beyond the scope of the subject matter of
6 the petition, and is vague.

7 2. Chelan County objects to Interrogatory No. 3(c) as Chelan County is
8 prevented from answering the question because the documents necessary to determine
9 that answer are under seal pursuant to Washington State Law as being the documents
10 pertinent to the 2004 general election. Further, if unsealed, in excess of 29,000
11 documents would be necessary to hand sort to determine which ones may be federal
12 write-in ballots. This is overburdensome in the context of time, costs, personnel, and
13 resources. Further, the interrogatory requests information irrelevant to the subject of
14 the petition and is also vague.

15 3. Chelan County objects to Request for Production No. 3. The request is for
16 materials irrelevant to the subject of the petition herein, and unduly overburdensome in
17 terms of time, resources, personnel, and cost. Records pertaining to elections and
18 primaries occurring prior to September 2004 have already been destroyed in the normal
19 course of business. Said records were destroyed before commencement of the general
20 election of November 2004. Further, Request for Production No. 3 is vague.

21 4. Chelan County objects to Interrogatory No. 14 in part. Interrogatory No.
22 14 requests the county identify the dates on which absentee and military overseas
23 ballots were mailed. Chelan County does not object to that request. However, Chelan
24 County objects to the second part of Interrogatory No. 14 which requests the county
25 identify the dates on which absentee, military, and overseas ballots were received after

1 the date of certification. Further, in Chelan County's voter registration system, military
2 and overseas ballots are treated as one group. Chelan County cannot produce a report
3 to separate each type of ballot. This interrogatory is unduly overburdensome in terms of
4 time, cost, personnel, and resources. Further, it requests information irrelevant to the
5 subject of the petition and is vague.

6 5. Chelan County hereby objects to Interrogatory No. 18. The call of the
7 question is vague and cannot be ascertained. Further, it is overburdensome to answer
8 in terms of time, personnel, resources, and cost, and it is asking for information that is
9 irrelevant to the subject of the petition herein.

10 6. Chelan County objects to Request for Production No. 9. This request is
11 asking for the production of documents currently under seal as having been part of the
12 November 2004 general election. Washington state law requires the Auditor to keep
13 them under seal. They would only be unsealed if a court ordered the Auditor to do so.
14 Additionally, only copies of the pertinent documentation would be provided and the
15 originals would be maintained in the custody of the Auditor for all time as the Auditor is
16 the repository of such records and has a duty to maintain the integrity of the documents.
17 Further, it would be unduly overburdensome to provide the specific ballots that were
18 enhanced or duplicated as any enhanced ballots were mixed back in with the total
19 ballots from the general election and the county would have to hand sort through in
20 excess of 29,000 ballots to determine which ones were possibly enhanced.

21 7. Chelan County objects to Interrogatories No. 30, 31, and 33. Responses
22 to these interrogatories would require the county to disclose confidential information
23 which governs the acquisition and maintenance of submitted ballots for each election.
24 The security of the voting system in Chelan County would be totally compromised if the
25 security measures were disclosed in the course of this litigation. It would be unduly

1 overburdensome for the county to make such disclosure because it would require then
2 that the county immediately design and implement new security measures as the
3 public's knowledge of the current security measures would make them obsolete.

4 8. Chelan County objects to Interrogatory No. 32. Names will be provided
5 but home addresses and phone numbers will not as that is private information and
6 irrelevant in this case. The address and phone number of the Chelan County Auditor
7 will be provided.

8 9. Chelan County objects to Request for Production No. 14, as it is again
9 requesting information that is kept under seal pursuant to Washington State Law as
10 being material pertinent to an election. Further, if court ordered to disclose, it would be
11 overburdensome in terms of time, cost, personnel, and resources to provide. Further,
12 other material pertaining to elections pre-dating the September 2004 primary have
13 already been destroyed in the normal course of business. Said destruction took place
14 prior to the November 2, 2004 general election. Thus, it is impossible to provide said
15 documents. Further, only copies, not originals, could be provided as Chelan County
16 must retain possession of originals at all times.

17 10. Chelan County objects to Request for Production No. 16. Responses to
18 this request would require the county to disclose confidential information which governs
19 the acquisition and maintenance of submitted ballots for each election. The security of
20 the voting system in Chelan County would be totally compromised if the security
21 measures were disclosed in the course of this litigation. It would be unduly
22 overburdensome for the county to make such disclosure because it would require then
23 that the county immediately design and implement new security measures as the
24 public's knowledge of the current security measures would make them obsolete.

