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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

NOTICE OF CR 30(b)(6) DEPOSITION  
OF COWLITZ COUNTY

1 **TO:** All Parties  
2  
3 **AND TO:** Their Counsel of Record  
4

5 PLEASE TAKE NOTICE, pursuant to CR 30 and CR 45, that the oral deposition of  
6 the person designated by Cowlitz County as the officer, director, managing agent or other  
7 person who consents to testify on Cowlitz County's behalf concerning the subjects specified  
8 below will be taken by Intervenor-Respondent Washington State Democratic Central  
9 Committee at the following time, date and place.  
10  
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14 <b>Time and Date</b>	15 <b>Place of</b>
16 <b>of Deposition</b>	17 <b>Deposition</b>
18 Friday, April 22, 2005 at 9:00 a.m.	19 312 S.W. 1 <sup>st</sup> Ave., Kelso, Washington 20 98626

21 The testimony will be recorded stenographically. The deposition shall be subject to  
22 continuance or adjournment from time to time and place to place until completed. The  
23 subject areas of the deposition will be:  
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27 (1) The policies and practices adopted or employed by Cowlitz County for the  
28 2004 General Election with respect to voter crediting;  
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31 (2) The policies and practices adopted or employed by Cowlitz County for the  
32 2004 General Election with respect to the issuance, receipt and processing of provisional  
33 ballots and what specific steps were taken, if any, to ensure compliance with the emergency  
34 regulations issued by the Secretary of State and codified at WAC 434-253-047, and when  
35 each such step was taken;  
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41 (3) The policies and practices adopted or employed by Cowlitz County for the  
42 2004 General Election with respect to the verification of signatures on provisional ballots;  
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45 (4) The extent to which Cowlitz County counted provisional ballots in the 2004  
46 General Election prior to signature verification, including the specific number of such  
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1 ballots and the names, addresses, phone numbers of all such voters, their precincts, and their  
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3 voter registration numbers;

4  
5 (5) If Cowlitz County counted provisional ballots prior to signature verification,  
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7 what steps were taken subsequent to the tabulation of the ballots to verify signatures, who  
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9 did each such step, what or who caused that step to be taken, and what was the result of  
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11 those steps (i.e., how many, if any, of the provisional ballots were determined to have been  
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13 voted by lawfully registered voters);

14  
15 (6) The extent to which Cowlitz County counted provisional ballots in the 2004  
16  
17 General Election prior to confirmation of voter registration or determination of whether the  
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19 voter had already voted, including the specific number of such ballots and the names,  
20  
21 addresses, phone numbers of all such voters, their precincts, and their voter registration  
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23 numbers; and

24  
25 (7) If Cowlitz County counted provisional ballots prior to confirmation of voter  
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27 registration or determination of whether the voter had already voted, what steps were taken  
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29 subsequent to the tabulation of the ballots to confirm voter registration or to determine  
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31 whether the voter had already voted, who did each such step, what or who caused that step  
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33 to be taken, and what was the result of those steps (i.e., how many, if any, of the provisional  
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35 ballots were determined to have been voted by lawfully registered voters).  
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39 Pursuant to CR 45, the witness has been directed to produce for examination and  
40  
41 copying at the time and place of the deposition, or such other time and place as may be  
42  
43 agreed upon prior to the deposition, the documents specified in Exhibit A to the Subpoena  
44  
45 Duces Tecum addresses to the witness, a copy of which is served herewith and  
46  
47 incorporated by reference.

1 DATED: April 8, 2005.  
2  
3

4 PERKINS COIE LLP

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15 Washington State Democratic Central  
16 Committee  
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