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 JEFFERSON COUNTY

Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, Washington 98101-3099
Phone: (206) 359-8000
Fax: (206) 359-9000

TO: All Parties

AND TO: Their Counsel of Record

PLEASE TAKE NOTICE, pursuant to CR 30 and CR 45, that the oral deposition of the person designated by Jefferson County as the officer, director, managing agent or other person who consents to testify on Jefferson County's behalf concerning the subjects specified below will be taken by Intervenor-Respondent Washington State Democratic Central Committee at the following time, date and place.

Time and Date of Deposition	Place of Deposition
Thursday, April 21, 2005 at 1:00 p.m.	1820 Jefferson St., Port Townsend, WA 98368

The testimony will be recorded stenographically. The deposition shall be subject to continuance or adjournment from time to time and place to place until completed. The subject areas of the deposition will be:

(1) The policies and practices adopted or employed by Jefferson County for the 2004 General Election with respect to voter crediting;

(2) The policies and practices adopted or employed by Jefferson County for the 2004 General Election with respect to the issuance, receipt and processing of provisional ballots and what specific steps were taken, if any, to ensure compliance with the emergency regulations issued by the Secretary of State and codified at WAC 434-253-047, and when each such step was taken;

(3) The policies and practices adopted or employed by Jefferson County for the 2004 General Election with respect to the verification of signatures on provisional ballots;

(4) The extent to which Jefferson County counted provisional ballots in the 2004 General Election prior to signature verification, including the specific number of such

Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, Washington 98101-3099
Phone: (206) 359-8000
Fax: (206) 359-9000

ballots and the names, addresses, phone numbers of all such voters, their precincts, and their voter registration numbers;

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

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

(7) If Jefferson County counted provisional ballots prior to confirmation of voter registration or determination of whether the voter had already voted, what steps were taken subsequent to the tabulation of the ballots to confirm voter registration or to determine whether the voter had already voted, who did each such step, what or who caused that step to be taken, and what was the result of those steps (i.e., how many, if any, of the provisional ballots were determined to have been voted by lawfully registered voters).

Pursuant to CR 45, the witness has been directed to produce for examination and copying at the time and place of the deposition, or such other time and place as may be agreed upon prior to the deposition, the documents specified in Exhibit A to the Subpoena Duces Tecum addresses to the witness, a copy of which is served herewith and incorporated by reference.

Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, Washington 98101-3099
Phone: (206) 359-8000
Fax: (206) 359-9000

DATED: April 8, 2005.

PERKINS COIE LLP

By Kevin J. Hamilton by RSE

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

Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, Washington 98101-3099
Phone: (206) 359-8000
Fax: (206) 359-9000