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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 SPOKANE 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
7 the person designated by Spokane County as the officer, director, managing agent or other
8
9 person who consents to testify on Spokane County's behalf concerning the subjects specified
10
11 below will be taken by Intervenor-Respondent Washington State Democratic Central
12
13 Committee at the following time, date and place.

14	15 Time and Date	16 Place of
17	18 of Deposition	19 Deposition
20	21 Friday, April 22, 2005 at 1:00 p.m.	22 1100 West Mallon, Spokane, Washington
23		24 99260

25 The testimony will be recorded stenographically. The deposition shall be subject to
26
27 continuance or adjournment from time to time and place to place until completed. The
28
29 subject areas of the deposition will be:

30 (1) The policies and practices adopted or employed by Spokane County for the
31
32 2004 General Election with respect to voter crediting;

33 (2) The policies and practices adopted or employed by Spokane County for the
34
35 2004 General Election with respect to the issuance, receipt and processing of provisional
36
37 ballots and what specific steps were taken, if any, to ensure compliance with the emergency
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39 regulations issued by the Secretary of State and codified at WAC 434-253-047, and when
40
41 each such step was taken;

42 (3) The policies and practices adopted or employed by Spokane County for the
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44 2004 General Election with respect to the verification of signatures on provisional ballots;

45 (4) The extent to which Spokane County counted provisional ballots in the 2004
46
47 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
2 voter registration numbers;
3

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

10 (6) The extent to which Spokane County counted provisional ballots in the 2004
11 General Election prior to confirmation of voter registration or determination of whether the
12 voter had already voted, including the specific number of such ballots and the names,
13 addresses, phone numbers of all such voters, their precincts, and their voter registration
14 numbers; and
15

16 (7) If Spokane County counted provisional ballots prior to confirmation of voter
17 registration or determination of whether the voter had already voted, what steps were taken
18 subsequent to the tabulation of the ballots to confirm voter registration or to determine
19 whether the voter had already voted, who did each such step, what or who caused that step
20 to be taken, and what was the result of those steps (i.e., how many, if any, of the provisional
21 ballots were determined to have been voted by lawfully registered voters).
22
23
24

25 Pursuant to CR 45, the witness has been directed to produce for examination and
26 copying at the time and place of the deposition, or such other time and place as may be
27 agreed upon prior to the deposition, the documents specified in Exhibit A to the Subpoena
28 Duces Tecum addresses to the witness, a copy of which is served herewith and
29 incorporated by reference.
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DATED: April 8, 2005.

PERKINS COIE LLP

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Committee

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