



Davis Wright Tremaine LLP

ANCHORAGE BELLEVUE LOS ANGELES NEW YORK PORTLAND SAN FRANCISCO SEATTLE SHANGHAI WASHINGTON, D.C.

DAVID M. BOWMAN
DIRECT (206) 628-7641
davidbowman@dwt.com

2600 CENTURY SQUARE
1501 FOURTH AVENUE
SEATTLE, WA 98101-1688

TEL (206) 622-3150
FAX (206) 628-7699
www.dwt.com

April 22, 2005

VIA E-MAIL & MESSENGER

Thomas F. Ahearne, Esq.
Foster Pepper & Shefelman PLLC
1111 Third Avenue, Suite 3400
Seattle, WA 98101-3299

Re: *Borders et al. v. King County et al. v. Washington State Democratic Central Committee*
Chelan County Cause No. 05-2-00027-3

Dear Counsel:

On behalf of the Petitioners, I am enclosing a Notice of Deposition of Sam Reed with respect to the deposition scheduled for this Monday, April 25, 2005 at 9:00 a.m. at the Olympia offices of Perkins Coie. We just wanted you to be aware that the Petitioners will have questions for Secretary of State Reed at the deposition. If you have concerns or questions, please let us know promptly, particularly if alternate arrangements need to be made regarding location or court reporter. Thank you.

Very truly yours,

Davis Wright Tremaine LLP

A handwritten signature in cursive script that reads "David M. Bowman".

David M. Bowman

Enclosures

cc: Peter Schalestock, Esq.
Harry J. F. Korrell, Esq.
Robert J. Maguire, Esq.
All Parties

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF CHELAN

TIMOTHY BORDERS, et al.,
Petitioners,
v.
KING COUNTY, et al.,
Respondents,
and
Washington State Democratic Central
Committee,
Intervenor-Respondent,
and
Libertarian Party of Washington State et al.,
Intervenor-Respondents.

No. 05-2-00027-3

**NOTICE OF DEPOSITION
OF SAM REED**

STATE OF WASHINGTON

TO: ALL PARTIES

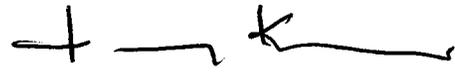
PLEASE TAKE NOTICE that the deposition upon oral examination of the following described person shall be recorded stenographically and will be taken before a person authorized to administer oaths on the following date and at the following time and place:

1 Witness: Sam Reed
2 Date: Monday, April 25, 2005
3 Hour: 9:00 a.m.
4 Place: Perkins Coie LLP
5 111 Market Street NE, Suite 200
6 Olympia, WA 98501

7 The said oral examination to be subject to continuance or adjournment from time to
8 time or place to place until completed, and to be taken on the ground and for the reason the
9 said witness will give evidence material to the above-captioned action.

10 DATED this 22nd day of April, 2005.

11 Davis Wright Tremaine LLP
12 Attorneys for Petitioners

13
14 By 
15 Harry J. F. Korrell, WSBA #23173
16 Robert J. Maguire, WSBA #29909
17 1501 Fourth Avenue, Suite 2600
18 Seattle, Washington 98101-1688
19 Telephone: (206) 622-3150

1 3. On April 22, 2005, the documents listed below were served:

2 **Letter addressed to Thomas F. Ahearne and Notice of Deposition of**
3 **Sam Reed**

4 On the following persons via electronic mail, with this Certificate of Service as follows:

5 **Kevin Hamilton, Esq.**
6 Perkins Coie LLP
7 Attorneys for Washington State Democratic
8 Central Committee
9 1201 Third Avenue, Suite 4800
10 Seattle, WA 98101
11 Email: KHamilton@perkinscoie.com

12 **Thomas Ahearne (and via messenger)**
13 For: Secretary of State Sam Reed
14 Foster Pepper & Shefelman
15 1111 Third Avenue, Suite 3400
16 Seattle WA 98101
17 Email: ahearne@foster.com

18 **Dale M. Foreman**
19 Foreman, Arch, Dodge, Volyn &
20 Zimmerman P.S.
21 124 North Wenatchee Avenue, Suite A
22 P.O. Box 3125
23 Wenatchee WA 98807-3125
24 Email: dalef@fadvz.com

25 **Richard Shepard**
26 **John S. Mills**
27 For: Libertarians
28 Shepard Law Office, Inc.
29 818 S. Yakima Avenue, #200
30 Tacoma, WA 98405
31 Email: richard@shepardlawoffice.com
32 Email: jmillslaw@gmail.com

33 **Gary Riesen**
34 Chelan County Prosecuting Attorney
35 PO Box 2596
36 Wenatchee WA 98807-2596
37 Email: Gary.Riesen@co.chelan.wa.us

38 **Tim O'Neill**
39 Klickitat County Prosecuting Attorney
40 205 South Columbus Ave., MS-CH18
41 Goldendale WA 98620
42 Email: timo@co.klickitat.wa.us

43 **Barnett N. Kalikow, Esq.**
44 For: Klickitat County Auditor
45 Kalikow & Gusa PLLC
46 1405 Harrison Avenue NW, Suite 207
47 Olympia WA 98502
48 Email: barnett.kalikow@gte.net

49 **L. Michael Golden**
50 Lewis County Senior Deputy Prosecuting
51 Attorney
52 345 West Main Street
53 Chehalis WA 98532
54 Email: LMGolden@co.lewis.wa.us

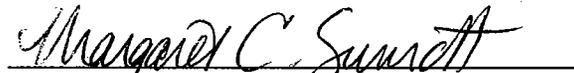
55 **Gorden Sivley**
56 **Michael C. Held**
57 Snohomish County Deputy Prosecuting
58 Attorneys
59 2918 Colby Avenue, Suite 203
60 Everett WA 98201-4011
61 Email: gsivley@co.snohomish.wa.us
62 Email: mheld@co.snohomish.wa.us

63 **Jeffrey T. Even, Asst. Attorney General**
64 For: Secretary of State Sam Reed
65 Attorney General's Office
66 PO Box 40100
67 Olympia WA 98504-0100
68 Email: jeffe@atg.wa.gov

1 **Russell J. Speidel,**
2 Speidel Law Firm,
3 7 North Wenatchee Avenue, Suite 600,
4 Wenatchee, WA 98807
5 Email: RussSpeidel@speidellaw.com.

6 I certify under penalty of perjury under the laws of the State of Washington that the
7 foregoing is true and correct.

8 DATED this 22nd day of April, 2005, at Seattle, Washington.

9 
10 Margaret C. Sinnott