

E-Filed
April 18, 2005

Siri A Woods
Chelan County Clerk

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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

WASHINGTON STATE DEMOCRATIC
CENTRAL COMMITTEE'S SECOND
INTERROGATORIES AND REQUESTS
FOR PRODUCTION TO RESPONDENT
LEWIS COUNTY AUDITOR GARY
ZANDELL

AND ANSWERS THERETO

WASHINGTON STATE DEMOCRATIC CENTRAL
COMMITTEE'S SECOND INTERROGATORIES
AND REQUESTS FOR PRODUCTION TO
RESPONDENT LEWIS COUNTY AUDITOR
GARY ZANDELL-1

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

1 **TO:** Respondent Lewis County & Lewis County Auditor Gary Zandell

2
3 **AND TO:** L. Michael Golden, Attorneys for Respondent Lewis County and Lewis
4 County Auditor Gary Zandell

5
6 Intervenor-Respondent Washington State Democratic Central Committee

7
8 ("WSDCC") makes the following interrogatories and requests for production to Respondent
9
10 Lewis County and the Lewis County Auditor (collectively "Lewis County" or the "County"),
11
12 pursuant to CR 26, 33 and 34.

13
14 **INSTRUCTIONS AND DEFINITIONS**

15
16 WSDCC hereby incorporates the Instructions and Definitions from its First
17
18 Interrogatories and Requests for Production.

19
20 **REQUESTS**

21
22 **INTERROGATORY NO. 22:** Please identify all expert witnesses you intend to
23
24 call at time of trial or to submit any testimony or evidence you use or rely on in this case,
25
26 and separately state as to each such expert witness:

- 27
28 (a) the subject matter(s) of that witness's expected testimony and evidence;
29
30 (b) the substance of the facts and opinions to which that witness is expected to
31
32 submit any testimony or evidence;
33
34 (c) a summary of the grounds and basis for each opinion to which that witness is
35
36 expected to submit any testimony or evidence; and
37
38 (d) the identity of all documents reviewed or relied upon by that witness in
39
40 forming the basis for the opinions and facts about which that witness is
41
42 expected to submit any testimony or evidence.

43
44 **ANSWER:**
45 None.
46
47

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REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 7: Please produce the documents you were asked to identify in the preceding Interrogatory, as well as:

(a) Any documents, objects, or materials reviewed or considered in connection with the preparation of any expert report rendered in this case;

(b) All documents provided to any expert by Petitioners, Petitioners' counsel, or any others representative of Petitioners;

(c) Any correspondence between any expert and Petitioners of any agent or representative of Petitioners; and

(d) Any drafts of any expert report prepared in this case.

RESPONSE:

Not Applicable.

DATED: April 8, 2005.

PERKINS COIE LLP

SPEIDEL LAW FIRM

Russell J. Speidel, WSBA # 12838
7 North Wenatchee Avenue, Suite 600
Wenatchee, WA 98807

By _____
Kevin J. Hamilton, WSBA # 15648
William C. Rava, WSBA # 29948
1201 Third Avenue, Suite 4800
Seattle, WA 98101-3099

JENNY A. DURKAN
Jenny A. Durkan, WSBA # 15751
c/o Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, WA 98101-3099

Attorneys for Intervenor-Respondent
Washington State Democratic Central
Committee

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Objections and Responses submitted this 15th day of April, 2005.

LEWIS COUNTY PROSECUTING ATTORNEY



L. MICHAEL GOLDEN, WSBA No. 26128
Lewis County Senior Deputy Prosecuting Attorney
Attorneys for Respondent Lewis County Auditor

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STATE OF WASHINGTON)
) ss.
COUNTY OF Lewis County)

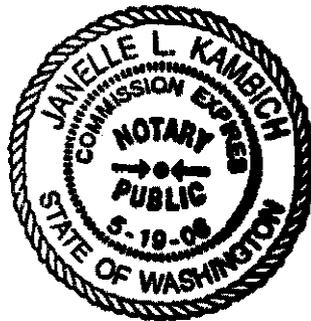
GARY ZANDELL, being first duly sworn on oath, deposes and says:

I am the Lewis County Auditor, and am authorized to make this verification on that Respondent's behalf. I have read the foregoing Answers and Responses to WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE'S SECOND INTERROGATORIES AND REQUESTS FOR PRODUCTION TO RESPONDENT LEWIS COUNTY AUDITOR GARY ZANDELL, know the contents thereof, and believe the same to be true.

Signature: Gary Zandell

Title: Lewis County Auditor

SUBSCRIBED AND SWORN to before me this 18th day of April, 2005.



Janelle Kambich
(Signature of Notary)
Janelle L. Kambich
(Legibly Print or Stamp Name of Notary)

Notary public in and for the State of Washington, residing at Chehalis.

My appointment expires: May 19, 2006

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