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 AMENDED NOTICE OF CR 30(b)(6) DEPOSITION OF THE SNOHOMISH COUNTY AUDITOR

Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, Washington 98101-3099
Phone: (206) 359-8000
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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 Snohomish County as the officer, director, managing agent or other person who consents to testify on Snohomish County's behalf concerning the subjects specified below will be taken by Intervenor-Respondent Washington State Democratic Central Committee telephonically at the following time, date and place.

Time and Date of Deposition	**Place of Deposition**
Friday, May 20, 2005 at 1:30 p. m.	Snohomish County Auditor's Office 2918 Colby, MS 504 Everett, WA 98201 and Perkins Coie LLP 1201 Third Avenue Suite 4800 Seattle, WA 98101

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) For each of the following voters:

Last Name	First Name	Middle Name	Address	Estimated Precinct
AZAMI	MARIAM	H.	4434 212th St P-12, Mountlake Terrace	Mountlake Terrace 14
BUNGAY	ADAM		20511 11th Dr, Bothell	Westbrook
MOORE	JULIA		25415 Mountain Dr, Arlington	Bryant
WOLF	ERICH	B.	23307 56th Ave, Mountlake Terrace	Mountlake Terrace 5
VENTRELLA	PETER	ANTHONY	303 83rd Drive, Everett WA	Crest

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whether the registered voter was validly registered to vote in the 2004 General Election; and

2) A signature comparison by a qualified election official in accordance with normal Snohomish County ballot validation signature comparison techniques will be requested at the deposition. The witness should be qualified to compare signatures from the voting records produced in accordance with the attached Amended Subpoena Duces Tecum to an absentee ballot envelope to be provided to the qualified election official at the deposition.

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 Amended Subpoena Duces Tecum addressed to the witness, a copy of which is served with this notice and incorporated by reference.

DATED: May 17, 2005.

PERKINS COIE LLP

By _____
for 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
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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 AMENDED CR 30(b)(6) SUBPOENA DUCES TECUM TO THE SNOHOMISH COUNTY AUDITOR

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TO: THE SNOHOMISH COUNTY AUDITOR

YOU ARE HEREBY COMMANDED, at the request of Intervenor-Respondent Washington State Democratic Central Committee and pursuant to CR 30 and CR 45, to appear telephonically at the time, date and place listed below to testify in the above-entitled case, and to remain in attendance until discharged.

Time and Date of Deposition	**Place of Deposition**
Friday, May 20, 2005 at 1:30 p. m.	Snohomish County Auditor's Office 2918 Colby, MS 504 Everett, WA 98201 and Perkins Coie LLP 1201 Third Avenue Suite 4800 Seattle, WA 9101

The deposition shall be subject to continuance or adjournment from time to time and place to place until completed.

YOU ARE FURTHER COMMANDED pursuant to CR 45 to bring with you at said place and time, or such other place and time prior to the deposition as may be agreed upon, the documents described in Exhibit A to this subpoena for examination and copying.

ALTERNATIVELY, to avoid the necessity of a lengthy deposition, the following may be completed and produced to the offices of Perkins Coie LLP, 1201 Third Avenue, 48th Floor, Seattle, Washington 98101, or another location mutually agreed on:

1) The documents listed in Exhibit A may be produced on or before the above-referenced date with a notarized declaration from the Records Custodian in the form of the attached Exhibit B, attesting under penalty of perjury that the enclosed documents are true

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and correct copies of all of the above-requested records which were kept and maintained in the usual course of business.

If documents are produced with a notarized declaration in the form of Exhibit B attached, the deposition will be limited to the signature comparison topic.

DATED: May 17, 2005.

PERKINS COIE LLP

By _____
Kevin J. Hamilton, WSBA # 15648
William C. Rava, WSBA # 29948
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Attorneys for Intervenor-Respondent
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EXHIBIT A

The term "document" in this subpoena means any written, typed, graphic, recorded, or electronically stored matter whatsoever. The term "document" thus includes, without limitation, emails, letters, faxes, pictures, files, summaries, electronic database records, spreadsheets, notes, drafts, records, logs and working papers.

Please produce all documents or other materials in your possession, custody, or control, relating to the voter registration of the following voters:

TERRY, DONNA L., 208 W. 31st Street, Vancouver, WA,
Estimated Clark County Precinct No. 100.

Without limitation, responsive material should include a copy of the voter's registration record including:

1) Date of Birth information; and

2) A signature image or signature card sufficient to enable the CR 30(b)(6) designee for the deposition notice attached hereto to conduct the signature comparison described in the attached deposition notice.

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EXHIBIT B

DECLARATION OF CUSTODIAN OF RECORDS

I, _____, being the duly authorized Custodian of Records, or other qualified witness at:

_____

_____

_____

say:

_____ That as of the date of this declaration, the attached documents are a true and complete copy of all records requested in the attached Amended Subpoena Duces Tecum which were kept and maintained by Clark County in the usual course of regularly conducted business activity by Clark County, which had the regular practice of making and maintaining these records.

_____ That as of the date of this declaration, I have not supplied the complete records requested in the attached Amended Subpoena Duces Tecum, and the following records have been omitted:

_____ That as of the date of this declaration, no records requested in the Amended Subpoena Duces Tecum are in my possession.

I hereby certify and declare under the penalty of perjury under the laws of the State of Washington, that the foregoing is true and correct.

_____

_____ [Print Name]

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