

EXHIBIT A

UNITED STATES OF AMERICA

The State of Washington



Certificate of Election

This is to Certify, That at the General Election held in the State of Washington on November 2, 2004,

Christine Gregoire

received the highest number of votes cast for the office of Governor

of said state of Washington, and was therefore duly elected to said office as appears from the official returns of said election as canvassed and certified in the manner provided by law.



In Testimony Whereof, We have hereunto set our hands and caused the Seal of the State of Washington to be affixed this 10th day of January, A.D. 2005, at Olympia, the State Capital.

President of the Senate

Speaker of the House of Representatives

Attest:

Secretary of State

EXHIBIT B



William C. Rava
PHONE: 206.359.6338
FAX: 206.359.7338
EMAIL: WRava@perkinscoie.com

1201 Third Avenue, Suite 4800
Seattle, WA 98101-3099
PHONE: 206.359.8000
FAX: 206.359.9000
www.perkinscoie.com

Via Facsimile

December 30, 2004

Ms. Heidi Hunt
Adams County Auditor's Office
210 West Broadway Avenue
Ritzville, WA 99169-1897

Re: Elections Record Request

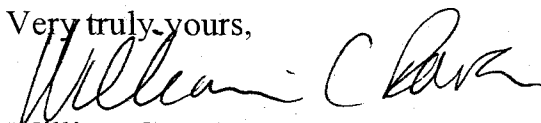
Dear Ms. Hunt:

Perkins Coie LLP represents the Washington State Democratic Central Committee. Pursuant to Washington Public Disclosure Act, RCW 42.17, we hereby request copies of or access to the following documents or categories of documents:

- (1) Copies of any public record request or document request submitted to you or your department by the Republican Party (state, county or other), any agent or representative of the Republican Party, or the Rossi for Governor campaign from November 1, 2004 to present.
- (2) Copies of any documents produced or provided in response to such requests. If such documents were produced or provided, or are available, in electronic form, we would respectfully request that they be provided to us in electronic form.

We appreciate your immediate attention to these requests. Please feel free to contact me with any questions.

Very truly yours,



William C. Rava

cc: David T. McDonald

[15934-0006-000000/SL043650.043]

ANCHORAGE · BEIJING · BELLEVUE · BOISE · CHICAGO · DENVER · HONG KONG · LOS ANGELES
MENLO PARK · OLYMPIA · PHOENIX · PORTLAND · SAN FRANCISCO · SEATTLE · WASHINGTON, D.C.

Perkins Coie LLP and Affiliates

EXHIBIT C

William C. Rava
PHONE: 206.359.6338
FAX: 206.359.7338
EMAIL: WRava@perkinscoie.com

1201 Third Avenue, Suite 4800
Seattle, WA 98101-3099
PHONE: 206.359.8000
FAX: 206.359.9000
www.perkinscoie.com

Via Facsimile

January 5, 2005

Ms. Heidi Hunt
Adams County Auditor's Office
210 West Broadway Avenue
Ritzville, WA 99169-1897

Re: Elections Record Request

Dear Ms. Hunt:

Perkins Coie LLP represents the Washington State Democratic Central Committee ("Washington Democrats"). We recognize and appreciate how hard your office has worked on ensuring the accuracy and fairness of the 2004 general election. We continue to pursue the same goals.

The Republican Party and Rossi campaign have indicated, however, that they intend to challenge the Governor's race and have hand-picked certain counties from which to gather information. Under the circumstances, and to further the strong public interest in accuracy and fairness, we have little choice but to investigate the facts for the entire state. Thus, pursuant to Washington Public Disclosure Act, RCW 42.17, we hereby request copies of or access to the following documents or categories of documents:

- (1) A list of all voters who submitted ballots in the November 2, 2004 general election, including the type of ballot cast (absentee, poll, provisional, military, etc.) and whether the ballot was counted.
- (2) All documents showing the reconciliation of voters counted to ballots cast for the 2004 general election, including the manual recount of the 2004 election for governor.
- (3) Agendas, minutes and recordings of proceedings from every meeting of the county canvassing board occurring between September 1, 2004 and December 31, 2004.

[15934-0006-000000/SL050050.071]

Ms. Heidi Hunt
January 5, 2005
Page 2

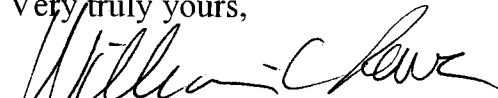
- (4) A list of all voter registrations deleted during 2004, including the date of deletion and reason for deletion.
- (5) All monthly reports of deceased individuals from the Department of Health to your office at any time from January 1, 2003 to the present date that were prepared or delivered pursuant to RCW 29A.08.510 or any other authority.
- (6) A list of all voter registrations moved to inactive status during 2004, including the date of the move and the reason for the move.

We recognize the additional burden these requests might place on election officials. We also know that the finality that Washington voters want and deserve can only come through a thorough, statewide investigation. Toward that end, we appreciate your immediate attention to these requests.

You may have received a request for an updated county voter file from Jeremy Sher on behalf the Washington Democrats in early November. My requests are separate and not intended to replace Mr. Sher's. Earlier this week, you may also have received telephonic requests from others associated with the Washington Democrats for some or all of the information described above; where duplicative, this letter is intended merely to memorialize those telephonic requests.

Please feel free to contact me with any questions.

Very truly yours,


William C. Rava

cc: David T. McDonald

EXHIBIT D

Rava, William C.

From: Diana Killian [DKillian@co.franklin.wa.us]
Sent: Thursday, January 06, 2005 11:18 AM
To: Rava, William C.
Cc: Zona Lenhart; Sue Boothe
Subject: Election Record Request
Importance: High

Dear Mr. Rava,

I am in receipt of your request dated January 5, 2005 via facsimile. Pursuant to Washington Public Disclosure Act, RCW 42.17 we will be glad to provide you with the 6 items requested by March 31, 2005.

The request Mr. Jeremy Sher has placed for an updated county voter file is not affected and will be provided as soon as possible.

Sincerely,

Diana Garza Killian
Election Administrator
Franklin County Election Department
PO Box 1451, Pasco WA 99301
509 545-3538 Fax 509 545-2148
www.co.franklin.wa.us



Donna M. Eldridge
JEFFERSON COUNTY AUDITOR

1820 JEFFERSON ST.

P.O. BOX 563, PORT TOWNSEND, WA 98368

(360) 385-9118

E-MAIL: deldridge@co.jefferson.wa.us

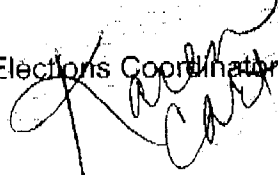
MEMO

JEFFERSON COUNTY ELECTIONS DIVISION

Karenc@co.jefferson.wa.us

360.385.9117

To: William C Rava, Perkins Cole
From: Karen Cartmel, Chief Deputy Auditor / Elections Coordinator
Date: January 7, 2005
Subj: Public Records Request



We are in receipt of your most recent public records request, received January 5, 2005.

Due to our workload and in preparation for our scheduled February 8th Election we are unable to process your request at this time. We have estimated that it could take up to approximately 15 business days to pull together your requested information.

Please advise us if you want photocopies of what we have available and if so, cost per copy is \$0.15 each.

We are still waiting to hear back from you in regards to your first request we received on December 30th. I left a message for you on January 3rd as to the amount you owe for copies made and what arrangements were to be made to get the information to you. Amount due for copies made for your first request is \$ 8.70 payable to Jefferson County Auditor.

Thank you.

Accounting
385-9121

Elections
385-9117

Licensing
385-9115

Recording
385-9116

FAX
385-9228

OKANOGAN COUNTY AUDITOR
PO BOX 1010
OKANOGAN, WA 98840
PHONE: (509) 422-7240

RECEIVED
JAN 10 2005
PERKINS COIE

January 6, 2005

Perkins Coie
Attention: William C Rava
1201 Third Avenue, Suite 4800
Seattle, WA 98101

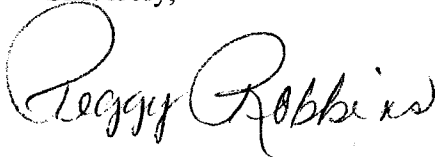
Dear Mr. Rava,

I received your request for information about the General Election. Unfortunately, we do not have the time to gather all the information you request for at least several months—probably by July, 2005. Most of the information you are requesting is not available without manually going through our files and pulling the information from our data. We are a very small office with one person working in elections and at this time we are in the process of training for a new vote counting system and we have an election in February that we are preparing for.

The one thing that we can easily provide for you is the list of all voters who submitted ballots in the November election. Okanogan County is all by mail, so all ballots were submitted through the mail, except for the few provisional ballots our office issued on Election Day. We can provide the list of voters to you on disk for a fee of \$15.00.

Please feel free to contact our office if you would like the disk and if you wish us to pursue the other information later in the year.

Sincerely,



Peggy Robbins
Okanogan County Auditor

SKAGIT COUNTY PROSECUTING ATTORNEY
THOMAS E. SEGUINE

RECEIVED

JAN 10 2005

PERKINS COIE

CIVIL DIVISION

605 SOUTH THIRD
MOUNT VERNON, WA 98273
PHONE: (360) 336-9460
FAX: (360) 336-9497
OFFICE HOURS: 8:30-4:30

CHIEF CIVIL DEPUTY
DON L. ANDERSON

CIVIL DEPUTY
MELINDA MILLER
CIVIL LITIGATOR
PAUL H. REILLY

January 7, 2005

William C. Rava
Attorney at Law
1201 Third Avenue, Suite 4800
Seattle, WA 98101-3099

RE: Public Disclosure Request – 2004 Election Information

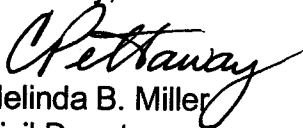
Dear William Rava:

We are in receipt of your public disclosure request dated January 5, 2005. Please be advised that from this point forward, I am the attorney who will be coordinating the Prosecuting Attorney's response to this request so any questions or concerns should be directed to me.

It will be necessary for Skagit County to locate, review and process the materials you have requested. Due to the fact that this office is presently handling a large number of public disclosure requests, and given the present staffing levels, Skagit County will make a good faith effort to produce the materials you have requested, on or before February 28, 2005. If we are able to provide this information before that date, we will do so.

I thank you for your consideration in this matter. If you have any questions or concerns, please do not hesitate to contact me at (360) 336-9460.

Sincerely,



FOR: Melinda B. Miller
Civil Deputy

MBM/cmp

cc: Auditor's Office

EXHIBIT E

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

Timothy Borders, Thomas Canterbury, Tom)
Huff, Margie Ferris, Paul Elvig, Edward)
Monaghan, Dino Rossi, and Christopher Vance,)
Washington residents and electors, and the Rossi)
for Governor Campaign, a candidate committee,)

Petitioners,)

v.)

King County and Dean Logan, its Director of)
Records, Elections and Licensing Services, et al.,)

Respondents)

No. 05-2-00027-3

**PETITIONERS' FIRST
INTERROGATORIES AND
REQUESTS FOR
PRODUCTION**

TO: KING COUNTY

Pursuant to Civil Rules 26, 33 and 34 and the orders of the court, you are hereby requested to supply responses to these interrogatories and requests for production, within 10 days of the service of these requests upon you. Petitioners request that the responses to the interrogatories and the documents herein designated for production be produced at the offices of Davis Wright Tremaine, LLP, 1501 Fourth Avenue, 2600 Century Square, Seattle, Washington 98101-1688, and that petitioners, or someone acting on their behalf, be permitted to inspect and copy the designated documents.

PETITIONERS' FIRST INTERROGATORIES
AND REQUESTS FOR PRODUCTION - 1

SEA 1595263v2 55441-3

Davis Wright Tremaine LLP
LAW OFFICES
2600 Century Square - 1501 Fourth Avenue
Seattle, Washington 98101-1688
(206) 622-3150 • Fax: (206) 628-7699

1 **DEFINITIONS**

2 For purposes of these requests for production, the following terms shall have the
3 meaning set forth below:

4 1. "You" means the respondent county to which these requests are addressed
5 above, its auditor, and their agents, employees, attorneys and representatives.

6 2. "Relating to" means pertinent, relevant or material to, evidencing, having a
7 bearing on, or concerning, affecting, discussing, dealing with, considering or otherwise
8 relating in any manner whatsoever to the subject matter of the inquiry.

9 3. A "measure," as in "any measures taken," includes any policy, procedure,
10 practice, effort, plan, or action whose purpose is or was the thing or result referred to.

11 4. The "November 2004 general election" refers to Washington's statewide
12 general election on November 2, 2004 and all subsequent recounts.

13 5. "Overvote" means a ballot containing marks in addition to a single,
14 completely filled-in oval for one candidate.

15 6. "Undervote" means a ballot containing a less than completely filled-in oval
16 for a candidate.

17 7. "Ballots Cast" means the total number of ballots containing a valid vote for
18 a candidate (whether printed on the ballot or written in) and those not counted because of
19 overvotes and undervotes.

20 8. "Voters Credited" means the number of voters who received credit for
21 voting in the county's voter registration database. Voters Credited includes voters in the
22 address confidentiality program, voters who cast federal write-in ballots without being
23 registered in the county for which they voted, and voters who had inactive registrations at
24 the time they voted.

25 9. "Reconciliation Discrepancy" means the difference between Ballots Cast
26 and Voters Credited.

1 10. When used with respect to provisional or absentee ballots, “verify,”
2 “verified,” or “verification” refers to the process of matching the information provided
3 with the provisional ballots (such as the voter’s name, address, signature, and date of birth)
4 with the voter registration database for the purpose of determining whether the voter is
5 eligible and registered to vote and whether the voter has voted another ballot.

6 **INTERROGATORIES AND REQUESTS FOR PRODUCTION**

7 REQUEST FOR PRODUCTION NO. 1: Please produce all documents describing,
8 recording, or referring to any attempt to reconcile the Ballots Cast with Voters Credited in
9 your county in the November 2004 general election.

10 RESPONSE:

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13 REQUEST FOR PRODUCTION NO. 2: Please produce all documents describing,
14 analyzing, or referring to any discrepancy between the number of Ballots Cast and the
15 number of Voters Credited in your county in the November 2004 general election.

16 RESPONSE:

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19 INTERROGATORY NO. 1: Please state the number of Ballots Cast, the number
20 of Voters Credited, and the Reconciliation Discrepancy in your county in the November
21 2004 general election and describe in detail how you calculated that number.

22 ANSWER:

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25 INTERROGATORY NO. 2: Please list (a) all the reasons for the Reconciliation
26 Discrepancy stated in your answer to the previous interrogatory, (b) state the portion of the
27

1 Reconciliation Discrepancy, in terms of the number of Ballots Cast, in excess of the
2 number of Voters Credited that you attribute to each reason, and (c) describe in detail how
3 you calculated these numbers. Responsive information will include information regarding
4 how many ballots of the discrepancy are due to provisional ballots' being counted without
5 being verified, information regarding what the other reasons are for the discrepancy and
6 how many ballots are explained by each reason, and information regarding how many of
7 the ballots of the discrepancy you can provide no explanation or reason for.

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9 ANSWER:

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12 INTERROGATORY NO. 3: Of the Voters Credited in your county in the
13 November 2004 general election, please state the number of them, respectively, who (a)
14 are in an address-confidentiality program; (b) had inactive registrations at the time they
15 voted; or (c) cast federal write-in ballots without being registered to vote in your county
16 and, for each category, describe in detail how you calculated the number.

17 ANSWER:

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20 REQUEST FOR PRODUCTION NO. 3: Please produce documents sufficient to
21 show (a) any Reconciliation Discrepancy in your county in any general election before the
22 November 2004 general election occurring in or since 1994 and (b) any consideration of
23 the causes of such discrepancies.

24 RESPONSE:

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REQUEST FOR PRODUCTION NO. 4: Please provide copies of all reports and communications sent to the Office of the Secretary of State between January 1, 2005, and the present regarding the Reconciliation Discrepancy in your county.

RESPONSE:

INTERROGATORY NO. 4: Please list the precincts in which more voters are credited with casting ballots than there were ballots counted as cast in such precinct. Provide the number of these discrepancies (total and per precinct.)

ANSWER:

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3 INTERROGATORY NO. 5: Please describe in detail all measures taken to ensure
4 that provisional ballots were not counted without first being verified in your county during
5 the November 2004 general election.

6 ANSWER:
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9 INTERROGATORY NO. 6: Please state the number of provisional ballots
10 counted without first being verified in your county during the November 2004 general
11 election and describe in detail how you identified those ballots and calculated that number.

12 ANSWER:
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15 INTERROGATORY NO. 7: Please state the number of provisional ballots counted
16 that have never been verified in your county during the November 2004 general election
17 and describe in detail how you identified those ballots calculated that number.

18 ANSWER:
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21 INTERROGATORY NO. 8: Please describe in detail all explanations for why, to
22 the best of your knowledge or belief, any provisional ballots were counted without first
23 being verified in your county during the November 2004 general election and state the
24 basis for your knowledge or belief.

25 ANSWER:
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2 INTERROGATORY NO. 9: Please state whether there is any way to distinguish
3 the provisional ballots cast in your county during the November 2004 general election
4 from other ballots and, if so, describe in detail every way in which such ballots could be
5 distinguished.

6 ANSWER:
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9 INTERROGATORY NO. 10: Please describe in detail all measures taken to
10 ensure that absentee ballots were not counted without first being verified in your county
11 during the November 2004 general election.

12 ANSWER:
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15 INTERROGATORY NO. 11: Please state the number of absentee ballots counted
16 without first being verified in your county during the November 2004 general election and
17 describe in detail how you calculated that number.

18 ANSWER:
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21 INTERROGATORY NO. 12: Please state the number of absentee ballots counted
22 without ever being verified in your county during the November 2004 general election and
23 describe in detail how you calculated that number.

24 ANSWER:
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1 INTERROGATORY NO. 13: Please describe in detail all explanations for why, to
2 the best of your knowledge or belief, any absentee ballots were counted without first being
3 verified in your county during the November 2004 general election and state the basis for
4 your knowledge or belief.

5 ANSWER:
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8 INTERROGATORY NO. 14: Please identify the dates on which absentee and
9 military overseas ballots were mailed, the number of each type of ballot, and for each day
10 from the date of the first mailing through the present how many of each type of ballot was
11 received by you.

12 ANSWER:
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15 INTERROGATORY NO. 15: Please state whether there is any way to distinguish
16 the absentee ballots cast in your county during the November 2004 general election from
17 other ballots and, if so, describe in detail every way in which such ballots could be
18 distinguished.

19 ANSWER:
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22 INTERROGATORY NO. 16: Please provide the number of absentee ballots
23 rejected because of signature mismatch and a list of the individuals who attempted to cast
24 such ballots.

25 ANSWER:
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PETITIONERS' FIRST INTERROGATORIES
AND REQUESTS FOR PRODUCTION - 8

SEA 1595263v2 55441-3

Davis Wright Tremaine LLP
LAW OFFICES

2600 Century Square · 1501 Fourth Avenue
Seattle, Washington 98101-1688
(206) 622-3150 · Fax: (206) 628-7699

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INTERROGATORY NO. 17: Please describe the process and standards used in the signature comparison process conducted in your county.

ANSWER:

INTERROGATORY NO. 18: Please provide the names of the individuals who conducted the signature review process and describe the training and guidance they received for this activity.

ANSWER:

REQUEST FOR PRODUCTION NO. 5: Please produce any written guidance provided or received by you regarding the signature verification process.

RESPONSE:

REQUEST FOR PRODUCTION NO. 6: Please produce all documents referring to or recording any communication between you and any citizen or voter in Washington regarding allegations of fraud, mistake, or canvassing errors concerning the November 2004 general election.

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RESPONSE:

INTERROGATORY NO. 19: Please describe in detail all measures taken to ensure that ballots cast by felons who had not had their voting rights restored were not counted in your county during the November 2004 general election.

ANSWER:

INTERROGATORY NO. 20: Please state the number of ballots cast by felons who had not had their voting rights restored in your county during the November 2004 general election and describe in detail how you calculated that number.

ANSWER:

INTERROGATORY NO. 21: Please describe in detail all explanations for why, to the best of your knowledge or belief, any ballots cast by felons who had not had their voting rights restored were counted in your county during the November 2004 general election and state the basis for your knowledge or belief.

ANSWER:

INTERROGATORY NO. 22: Please describe in detail all measures taken to ensure that ballots cast in the name of dead persons were not counted in your county during the November 2004 general election.

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INTERROGATORY NO. 23: Please state the number of ballots cast in the name of dead persons in your county during the November 2004 general election and describe in detail how you calculated that number.

ANSWER:

INTERROGATORY NO. 24: Please describe in detail all explanations for why, to the best of your knowledge or belief, any ballots cast in the name of dead persons were counted in your county during the November 2004 general election and state the basis for your knowledge or belief.

ANSWER:

INTERROGATORY NO. 25: Please describe in detail all measures taken to ensure that ballots cast by voters voting more than once—whether by multiple ballots of one or more type(s) (poll, provisional, absentee), by being registered to vote in more than one jurisdiction or using more than one name, or otherwise—were not counted in your county during the November 2004 general election.

ANSWER:

INTERROGATORY NO. 26: Please state the number of ballots cast by persons voting more than once—whether by multiple ballots of one or more type(s) (poll, provisional, absentee), by being registered to vote in more than one jurisdiction or using

1 more than one name, or otherwise—in your county during the November 2004 general
2 election and describe in detail how you calculated that number.

3 ANSWER:

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6 INTERROGATORY NO. 27: Please describe in detail all explanations for why, to
7 the best of your knowledge or belief, any ballots cast by persons voting more than once—
8 whether by multiple ballots of one or more type(s) (poll, provisional, absentee), by being
9 registered to vote in more than one jurisdiction or using more than one name, or
10 otherwise—were counted in your county during the November 2004 general election and
11 state the basis for your knowledge or belief.

12 ANSWER:

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15 INTERROGATORY NO. 28: Please identify all audits of your county's voting or
16 canvassing procedures conducted in the last five years, whether or not they were related to
17 a particular election.

18 ANSWER:

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21 REQUEST FOR PRODUCTION NO. 7: Please produce all documents describing,
22 summarizing, or referring to the performance or results of all audits identified in your
23 answer to the preceding interrogatory.

24 RESPONSE:

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PETITIONERS' FIRST INTERROGATORIES
AND REQUESTS FOR PRODUCTION - 12

SEA 1595263v2 55441-3

Davis Wright Tremaine LLP
LAW OFFICES
2600 Century Square · 1501 Fourth Avenue
Seattle, Washington 98101-1688
(206) 622-3150 · Fax: (206) 628-7699

1 INTERROGATORY NO. 29: Please describe in detail the instructions and criteria
2 provided to any people responsible for identifying, counting, and enhancing or duplicating
3 undervotes or overvotes in your county in the November 2004 general election and the
4 means by which such instructions or criteria were communicated.

5 ANSWER:

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8 REQUEST FOR PRODUCTION NO. 8: Please produce all documents relating to
9 any instructions or criteria provided to any people responsible for identifying, counting,
10 and enhancing or duplicating undervotes or overvotes in your county in the November
11 2004 general election, including any e-mails, memos, directives, or manuals stating,
12 referring to, or implementing any criteria or procedures for such enhancement or
13 correction.

14 RESPONSE:

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17 REQUEST FOR PRODUCTION NO. 9: Please produce for inspection the
18 originals of all ballots that were enhanced or duplicated in your county in the November
19 2004 general election.

20 RESPONSE:

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24 INTERROGATORY NO. 30: Please describe in detail how and where ballots have
25 been stored in your county since Election Day.

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PETITIONERS' FIRST INTERROGATORIES
AND REQUESTS FOR PRODUCTION - 13

SEA 1595263v2 55441-3

Davis Wright Tremaine LLP
LAW OFFICES
2600 Century Square • 1501 Fourth Avenue
Seattle, Washington 98101-1688
(206) 622-3150 • Fax: (206) 628-7699

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ANSWER:

INTERROGATORY NO. 31: Please describe in detail all security measures taken at each location where ballots were stored or counted during, respectively, the November 2004 general election and each subsequent recount, to ensure that no ballots were tampered with, altered, or added to or removed from the containers, vault, or other storage area used to hold ballots.

ANSWER:

INTERROGATORY NO. 32: Please identify by name, address, and telephone number every person who had access to ballots cast in your county in the November 2004 general election, including all persons who had access to ballots in the containers, vault, or other storage area used to hold ballots.

ANSWER:

INTERROGATORY NO. 33: Provide a detailed description of the dates and hours that security personnel were stationed at any facility at which ballots from the November 2004 general election have been stored or counted in your county, and the number of security personnel at each time.

ANSWER:

1 REQUEST FOR PRODUCTION NO. 10: Please produce all documents stating,
2 referring to, or implementing any policy, procedure, or practice for handling or counting
3 absentee or provisional ballots in your county since January 2004, including any changes to
4 such policies, procedures, or practices.

5 RESPONSE:
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8 REQUEST FOR PRODUCTION NO. 11: Please produce all documents stating,
9 referring to, or implementing any policies, procedures, or practices for handling or counting
10 ballots cast in your county in the November 2004 general election for which there appears to
11 be no valid signature on the ballot envelope or poll book, or on the voter registration record.

12 RESPONSE:
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15 REQUEST FOR PRODUCTION NO. 12: Please produce all documents stating,
16 referring to, or implementing any *changes* to any policies, procedures, or practices for
17 handling or counting ballots cast in your county in the November 2004 general election for
18 which there appears to be no signature on the ballot envelope or poll book, or on the voter
19 registration record.

20 RESPONSE:
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23 REQUEST FOR PRODUCTION NO. 13: Please produce all documents that
24 describe, refer to, or record any problem, issue, security breach, alarm activation, or complaint
25 regarding the security of ballots cast in your county in the November 2004 general election.

26 RESPONSE:
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REQUEST FOR PRODUCTION NO. 14: Please produce all documents that describe, memorialize, or record any Canvassing Board meetings that have occurred in your county since January 1, 2004.

RESPONSE:

REQUEST FOR PRODUCTION NO. 15: Produce any and all reports (including but not limited to electronic communications) or complaints from or between elections staff or observers regarding election irregularities in your county, including but not limited to any allegations of security breaches, ballot mishandling, counting issues, mistakes, or any irregularities, and the like, from January 1, 2004 to present.

RESPONSE:

REQUEST FOR PRODUCTION NO. 16: Produce documents sufficient to show the dates and hours for which security personnel were stationed at any facility in your county at which ballots from the November 2004 general election have been stored or counted.

RESPONSE:

REQUEST FOR PRODUCTION NO. 17: Please produce all documents constituting, referring to, or recording any communications between you and the Secretary of State or any person employed by that office concerning the November 2004 general

1 election, including any communications regarding allegations of fraud, mistake,
2 canvassing errors, or affidavits submitted by voters whose ballots were not counted.

3 RESPONSE:

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6 REQUEST FOR PRODUCTION NO. 18: Please produce the complete
7 countywide Voter File for your county, including permanent and temporary absentee
8 marks and all available vote history through the General Election of November 2, 2004.
9 Please produce this in a machine readable format including a file layout and/or column
10 headers. Such file should include, but not be limited to, the following items:

- 11 a. Voter full name, including first name, middle name or initial, last name, suffix
12 and prefix if applicable
- 13 b. Voter full registration address, including street address and unit number if
14 applicable, city, state, and nine-digit zip code.
- 15 c. Voter full mailing address, even if identical to voter registration address,
16 including street address and unit number if applicable, city, state, and nine-digit zip
17 code.
- 18 d. Voter Registration Number, which also may be called Affidavit Number or
19 Voter ID Number.
- 20 e. Registration Date
- 21 f. Registration Status, such as Active or Inactive, and Registration Activity Date,
22 which may also be called Last Voted Date.
- 23 g. Birthdates
- 24 h. District designations, including but not limited to Precinct, Legislative District,
25 Congressional District and County Council District

26 RESPONSE:

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PETITIONERS' FIRST INTERROGATORIES
AND REQUESTS FOR PRODUCTION - 17


SEA 1595263v2 55441-3

Davis Wright Tremaine LLP
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DATED this 10th day of January, 2005.

Davis Wright Tremaine LLP
Attorneys for Petitioners

By 
Harry J.F. Korrell, WSBA #23173
Robert J. Maguire, WSBA #29909

RESPONSES DATED this ____ day of _____, 2005.

By _____
Attorneys for _____

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STATE OF WASHINGTON)
)ss.
COUNTY OF _____)

_____, being first duly sworn, upon oath, deposes and states: That he/she an officer of the _____ in this lawsuit, that he has read the within and foregoing interrogatories and answers thereto, knows the contents thereof, and believes the same to be true and correct to the best of his knowledge.

Its _____

SUBSCRIBED AND SWORN TO before me this ____ day of _____, 2005.

NOTARY PUBLIC in and for the State of
Washington, residing at _____
My commission expires _____

EXHIBIT F

LAWYERS



Davis Wright Tremaine LLP

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

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January 10, 2005

Via Messenger

The Honorable TW Small
Chelan County Superior Court
401 Washington St.
PO Box 3025
Wenatchee, WA 98807

Re: *Borders v. King County et al.*
Chelan County Superior Court Cause No.: 05-2-00027-3

Dear Judge Small:

Attached is a copy of the discovery requests mentioned in Petitioner's Motion for Expedited Discovery, filed Friday. These have been served on King County, and we anticipate serving similar requests on the other respondents shortly.

Very truly yours,

Davis Wright Tremaine LLP

Heather Klapmeier, Secretary to
Robert J. Maguire