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April 18, 2005

## VIA MESSENGER

Kevin Hamilton, Esq.  
Perkins Coie LLP  
1201 Third Avenue  
Suite 4800  
Seattle, WA 98101-3099

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

Dear Mr. Hamilton:

On behalf of the Petitioners, I am supplementing the Rossi Campaign's responses to the WSDCC's discovery requests, as follows:

**RFP No. 2, 1<sup>st</sup> Set.** As a supplement to the Rossi Campaign's response to the WSDCC's Request for Production No. 2 of its First Set of Interrogatories and Requests for Production, the Rossi Campaign produces documents regarding felons who voted despite their being ineligible to vote (including conviction records), numbered RC 14811-15190 and 15906-16315. In addition, to the extent that counties produced voter data in electronic format in response to Petitioners' formal discovery requests, Petitioners produce CDs containing copies of the voter data as well as copies of those counties' written responses and/or correspondence transmitting the voter data. These counties include:

County	CD Bates Number
Adams	B/Adam 000001
Chelan	B/Chel 000802
Clallam	B/Clal 000001



<b>County</b>	<b>CD Bates Number</b>
Clark	B/Clar 000001
Ferry	B/Ferr 000001
Franklin	B/Fran 000001
Garfield	B/Garf 000001
Grant	B/Gran 000001
Grays Harbor	B/Gray 000001
Island	B/Isla 000001
Jefferson	B/Jeff 000001
Kittitas	B/Kitt 000001
Klickitat	B/Klic 000001
Lewis	B/Lewi 000001 - 000002
Mason	B/Maso 000396 – 000397
Okanogan	B/Okan 000001
Pend Oreille	B/Pend 000001
San Juan	B/ Sanj 000175
Stevens	B/Stev 000001
Wahkiakum	B/Wahk 000001
Walla Walla	B/Wall 000001
Whitman	Whitman County produced to Petitioners a floppy disk containing voter data but the disk was apparently corrupt and could not be copied, so it is not being produced by Petitioners

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**RFP No. 8, 3<sup>rd</sup> Set of RFPs.** Supplementing its response to Request No. 8 of the WSDCC's Second Set of Interrogatories and Third Requests for Production, the Rossi Campaign produces the following:

CD numbered B/KING 3029-CD, containing King County Elections Policies.

CD numbered B/KING 4127-CD, containing Poll Worker Training Materials - Guide to Etiquette and Behavior for Working with People with Disabilities, Inspector Training 2004 PP, People First Language Guidelines, Poll Worker Review 2004 PP, Poll Worker Training 2004 PP.

CD numbered B/KING 3372-CD, containing DIMS Net Training and User Manuals.

**RFP No. 10, 3<sup>rd</sup> Set of RFPs.** Supplementing its response to Request No. 10 of the WSDCC's Second Set of Interrogatories and Third Requests for Production regarding documents referring or relating to the restoration of voting rights of any Washington felon, the Rossi Campaign produces documents numbered RC 15244-15542.

**Public Records Requests.** By agreement of the parties, petitioners produce copies of Public Records Act Requests sent by the Washington State Republican Party to various counties, numbered RC 015191-15243. In addition, petitioners produce documents numbered B/KING 004284-004330 (e-mails printed by Bill Huennekens and produced to petitioners in response to a Public Disclosure Request). The e-mail numbered B/KING 004284 was produced to petitioners by King County without the attachment referenced in the e-mail. Petitioners produce a copy of the attachment to that e-mail, numbered RC 015905.

Petitioners will continue to supplement their discovery responses as required by the Civil Rules.

Very truly yours,

Davis Wright Tremaine LLP

David M. Bowman

Enclosures

cc: Thomas F. Ahearne, Esq. (w/o enclosures)  
Peter Schalestock, Esq. (w/o enclosures)  
Harry J. F. Korrell, Esq. (w/o enclosures)  
Robert J. Maguire, Esq. (w/o enclosures)