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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

NOTICE OF CR 30(b)(6) DEPOSITION
OF ISLAND COUNTY

1 **TO:** All Parties

2
3 **AND TO:** Their Counsel of Record

4
5 PLEASE TAKE NOTICE, pursuant to CR 30 and CR 45, that the oral deposition of
6
7 the person designated by Island County as the officer, director, managing agent or other
8
9 person who consents to testify on Island County's behalf concerning the subjects specified
10
11 below will be taken by Intervenor-Respondent Washington State Democratic Central
12
13 Committee at the following time, date and place.

14
15 **Time and Date**
16 **of Deposition**

15 **Place of**
16 **Deposition**

17
18 Thursday, April 21, 2005 at 9:00 a.m.

17
18 101 Northeast 6th Street, Coupeville,
19 Washington 98239

20
21 The testimony will be recorded stenographically. The deposition shall be subject to
22
23 continuance or adjournment from time to time and place to place until completed. The
24
25 subject areas of the deposition will be:

26
27 (1) The policies and practices adopted or employed by Island County for the
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29 2004 General Election with respect to voter crediting;

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31 (2) The policies and practices adopted or employed by Island County for the
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33 2004 General Election with respect to the issuance, receipt and processing of provisional
34
35 ballots and what specific steps were taken, if any, to ensure compliance with the emergency
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37 regulations issued by the Secretary of State and codified at WAC 434-253-047, and when
38
39 each such step was taken;

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41 (3) The policies and practices adopted or employed by Island County for the
42
43 2004 General Election with respect to the verification of signatures on provisional ballots;

44
45 (4) The extent to which Island County counted provisional ballots in the 2004
46
47 General Election prior to signature verification, including the specific number of such

1 ballots and the names, addresses, phone numbers of all such voters, their precincts, and their
2
3 voter registration numbers;

4
5 (5) If Island County counted provisional ballots prior to signature verification,
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7 what steps were taken subsequent to the tabulation of the ballots to verify signatures, who
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9 did each such step, what or who caused that step to be taken, and what was the result of
10
11 those steps (i.e., how many, if any, of the provisional ballots were determined to have been
12
13 voted by lawfully registered voters);

14
15 (6) The extent to which Island County counted provisional ballots in the 2004
16
17 General Election prior to confirmation of voter registration or determination of whether the
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19 voter had already voted, including the specific number of such ballots and the names,
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21 addresses, phone numbers of all such voters, their precincts, and their voter registration
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23 numbers; and

24
25 (7) If Island County counted provisional ballots prior to confirmation of voter
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27 registration or determination of whether the voter had already voted, what steps were taken
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29 subsequent to the tabulation of the ballots to confirm voter registration or to determine
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31 whether the voter had already voted, who did each such step, what or who caused that step
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33 to be taken, and what was the result of those steps (i.e., how many, if any, of the provisional
34
35 ballots were determined to have been voted by lawfully registered voters).

36
37
38 Pursuant to CR 45, the witness has been directed to produce for examination and
39
40 copying at the time and place of the deposition, or such other time and place as may be
41
42 agreed upon prior to the deposition, the documents specified in Exhibit A to the Subpoena
43
44 Duces Tecum addresses to the witness, a copy of which is served herewith and
45
46 incorporated by reference.
47

1 DATED: April 8, 2005.
2
3

4 **PERKINS COIE LLP**

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15 Washington State Democratic Central
16 Committee
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