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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

SUBPOENA DUCES TECUM TO
SAMANTHA DUNCAN

1 **TO: SAMANTHA DUNCAN**

2
3 YOU ARE HEREBY COMMANDED, at the request of Intervenor-Respondent
4 Washington State Democratic Central Committee and pursuant to CR 30 and CR 45, to
5 appear at the time, date and place listed below to testify in the above-entitled case, and to
6 remain in attendance until discharged.
7
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9

10
11 **Time and Date**
12 **of Deposition**

11 **Place of**
12 **Deposition**

13
14 Tuesday, April 26, 2005 at 1:00 p.m.

14 Perkins Coie LLP, 1201 Third Avenue,
15 Suite 4800, Seattle, WA 98101-3099

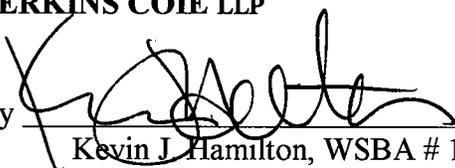
16
17 The deposition shall be subject to continuance or adjournment from time to time and place
18 to place until completed.
19

20
21 YOU ARE FURTHER COMMANDED pursuant to CR 45 to bring with you at
22 said place and time, or such other place and time prior to the deposition as may be agreed
23 upon, the documents described in Exhibit A to this subpoena for examination and copying.
24
25
26

27 DATED: April 12, 2005.

28
29
30 **PERKINS COIE LLP**

30 **SPEIDEL LAW FIRM**

31
32
33
34 By 

35 Kevin J. Hamilton, WSBA # 15648
36 William C. Rava, WSBA # 29948
37 1201 Third Avenue, Suite 4800
38 Seattle, WA 98101-3099

31 Russell J. Speidel, WSBA # 12838
32 7 North Wenatchee Avenue, Suite 600
33 Wenatchee, WA 98807

34
35 **JENNY A. DURKAN**

36 Jenny A. Durkan, WSBA # 15751
37 c/o Perkins Coie LLP
38 1201 Third Avenue, Suite 4800
39 Seattle, WA 98101-3099

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41 Attorneys for Intervenor-Respondent
42 Washington State Democratic Central
43 Committee
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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, spreadsheets, notes, drafts, records, logs and working papers.

All documents in your possession, custody or control regarding voter crediting.

Without limitation, responsive documents should include:

- (1) Documents regarding crediting or lack of crediting for a specific voter or group of voters;
- (2) Documents regarding any problems or difficulties with voter crediting for the November 2004 election, including any "log" or compilation of problems, difficulties, or errors related to voter crediting for the November 2004 election; and
- (3) Documents regarding any instances of deletion of voter IDs or image IDs from any King County voter registration database that is used in any way in connection with the validation of absentee or provisional ballots.