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

WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE'S SECOND INTERROGATORIES AND REQUESTS FOR PRODUCTION TO RESPONDENT SECRETARY OF STATE

WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE'S SECOND INTERROGATORIES AND REQUESTS FOR PRODUCTION TO RESPONDENT SECRETARY OF STATE -1

[15934-0006-000000/SL050980.133]

Perkins Coie LLP 1201 Third Avenue, Suite 4800 Seattle, Washington 98101-3099 Phone: (206) 359-8000 Fax: (206) 359-9000

TO: Respondent Secretary of State ("Secretary")

AND TO: Jeffrey Even and Thomas Ahearne, Attorneys for Respondent Secretary of State

Intervenor-Respondent Washington State Democratic Central Committee ("WSDCC") makes the following interrogatories and requests for production to Respondent Secretary of State, pursuant to CR 26, 33 and 34.

INSTRUCTIONS AND DEFINITIONS

WSDCC hereby incorporates the Instructions and Definitions from its First Interrogatories and Requests for Production.

REQUESTS

INTERROGATORY NO. 13: Please identify all expert witnesses you intend to call at time of trial or to submit any testimony or evidence you use or rely on in this case, and separately state as to each such expert witness:

- (a) the subject matter(s) of that witness's expected testimony and evidence;
- (b) the substance of the facts and opinions to which that witness is expected to submit any testimony or evidence;
- (c) a summary of the grounds and basis for each opinion to which that witness is expected to submit any testimony or evidence; and
- (d) the identity of all documents reviewed or relied upon by that witness in forming the basis for the opinions and facts about which that witness is expected to submit any testimony or evidence.

ANSWER:

WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE'S SECOND INTERROGATORIES AND REQUESTS FOR PRODUCTION TO RESPONDENT SECRETARY OF STATE -2

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Perkins Coie LLP

REQUEST FOR PRODUCTION NO. 6: Please produce the documents you were asked to identify in the preceding Interrogatory, as well as:

- (a) Any documents, objects, or materials reviewed or considered in connection with the preparation of any expert report rendered in this case;
- (b) All documents provided to any expert by Petitioners, Petitioners' counsel, or any others representative of Petitioners;
- (c) Any correspondence between any expert and Petitioners or any agent or representative of Petitioners; and
- (d) Any drafts of any expert report prepared in this case.

RESPONSE:

DATED: April 8, 2005.

PERKINS COIE LLP

Kevin J. Hamilton, WSBA # 15648 William C. Rava, WSBA # 29948

1201 Third Avenue, Suite 4800 Seattle, WA 98101-3099

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WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE'S SECOND INTERROGATORIES AND REQUESTS FOR PRODUCTION TO RESPONDENT SECRETARY OF STATE -3

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