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The Honorable John E. Bridges

SUPERIOR COURT OF WASHINGTON FOR CHELAN COUNTY

Timothy Borders, et al,)	
)	
)	Petitioners,
)	No. 05-2-00027-3
)	
vs.)	
)	MOTION FOR PROTECTIVE ORDER
King County and Dean Logan, et al,)	RE: DEPOSITIONS OF DEAN
)	LOGAN AND BILL HUENNEKENS
)	
)	Respondents,
)	
Washington State Democratic Central Committee,)	
)	
)	Intervenor,
)	
Libertarian Party of Washington State, and Ruth)	
Bennett Campaign,)	
)	
)	Intervenors.

I. RELIEF REQUESTED

Dean Logan, Director of King County’s Records, Elections, and Licensing Services Division, and Bill Huennekens, King County Superintendent of Elections, by and through their attorney, Donald J. Porter, King County Senior Deputy Prosecuting Attorney, move this court for a protective order which provides the following relief:

- 1 1. An order that would require all parties with an interest in questioning Mr. Logan
2 and Mr. Huennekens under oath to do so at a single deposition of each witness.
- 3 2. An order that would compel all parties with an interest in questioning Mr. Logan
4 and Mr. Huennekens to do so at the depositions set by petitioners for March 28,
5 2005, and March 31, 2005, respectively; or, in the alternative, an order quashing
6 the depositions set for March 28 and March 31, and resetting those depositions on
7 dates that would allow all parties adequate time to prepare for the depositions.

8 **II. STATEMENT OF FACTS**

9 See the declaration of Donald J. Porter, counsel for Mr. Logan and Mr. Huennekens,
10 which accompanies this motion.

11 **III. STATEMENT OF THE ISSUES**

- 12 1. Whether King County elections officials Dean Logan and Bill Huennekens, non-
13 parties in this action, should be required to submit to multiple depositions on
14 various dates established by the multiple parties to this lawsuit? Or,
15
- 16 2. Whether it is reasonable to limit the burden on these witnesses by establishing a
17 single deposition for each witness at times that would allow all parties to be
18 reasonably prepared for the depositions?

19 **IV. EVIDENCE RELIED UPON**

20 The motion is based on the declaration of Donald J. Porter, attorney for Mr. Logan and
21 Mr. Huennekens.

