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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF CHELAN

Timothy Borders, Thomas Canterbury, Tom
Huff, Margie Ferris, Paul Elvig, Edward
Monaghan, and Christopher Vance, Washington
residents and electors, and the Rossi for
Governor Campaign, a candidate committee,

Petitioners,

v.

King County and Dean Logan, its Director of
Records, Elections and Licensing Services, et al.,

Respondents.

and

Washington State Democratic Central
Committee,

Intervenor-Respondent,

and

Libertarian Party of Washington State et al.,

Intervenor-Respondents.

No. 05-2-00027-3

SUBPOENA DUCES TECUM

1 STATE OF WASHINGTON

2 To: Records Custodian
3 King County Division of Records, Elections, and Licensing Services
4 500 4th Avenue, Room 553
Seattle, WA 98104

5 GREETINGS:

6 YOU ARE HEREBY COMMANDED to be and appear as follows:

7 PLACE: Offices of Davis Wright Tremaine
8 1501 4th Avenue, Suite 2600
9 Seattle, WA 98101

10 DATE: Friday, May 6, 2005

11 TIME: 9:00 a.m. PST

12 To produce and permit inspection and copying of the documents or objects in
13 accordance with attached Attachment A at the place, date, and time specified above, at the
14 request of the Petitioners in the above-entitled cause. If documents or objects are received
15 at the above specified location by the specified date and time, your attendance is waived.

16 DATED this 29th day of April, 2005.

17
18 Davis Wright Tremaine LLP
Attorneys for Petitioners

19
20 By *Davis M. Bourman*
21 Harry J. F. Korrell, WSBA #23173
22 Robert J. Maguire, WSBA #29909
23 1501 Fourth Avenue, Suite 2600
Seattle, Washington 98101-1688
24 Telephone: (206) 622-3150
25
26
27

ATTACHMENT "A"

I. DEFINITIONS

"Document" means, without limiting without limiting its generality, the original (or a copy when the original is not available) and each non identical copy (including those which are non identical by reason of notations and markings) of papers, writings and records of any nature whatsoever, including, but not limited to, electronic mail messages, contracts, agreements, correspondence, letters, telegrams, wires, cables, reports, schedules, diaries, statements, photographs, reproductions, maps, surveys, plats, drawings, blueprints, sketches, charts, models, invoices, purchase orders, ledgers, journals, checks, check stubs, notes, estimates, summaries, desk calendars, work papers, studies, appointment books, time sheets, logs, inventories, printouts, computer tapes, tape recordings, video recordings, microfilm, microfiche, recordings, or other data compilations from which information can be' obtained through detection devices into reasonably usable form, minutes of meetings, memoranda, including intercorporate, intracorporate, interoffice and intraoffice memoranda, memoranda regarding conferences, conversations or telephone conversations and any and all written, printed, typed, punched, or recorded matter of whatsoever kind of description, including drafts of any of the foregoing, as well as any computer disks, computer files, computer hard drives, computer backup tapes, archival media, or other electronic data, document or message storage of any kind or nature (whether on a disk, hard drive, file server, personal computer or other medium).

"You" or "your agents, servants, employees, attorneys, or representatives" includes but is not limited to all persons, professionals and/or associates, legal assistants and/or support staff who performed work as part of your team or under your supervision or at your direction in connection with the topics identified in this subpoena.

II. INSTRUCTIONS

1. Please produce all the documents, described below, wherever located, which are in the possession, custody or control of you or any of your agents, servants, employees, attorneys, or representatives.

2. Any copy of a document that varies in any way from the original or from any other copy of the document, whether by reason of handwritten or other notation or any omission, shall constitute a separate document and must produced.

3. The original of each document requested is to be produced. Each document requested is also to be produced for inspection in its original file folder, file jacket, or cover.

4. Documents are to be produced in such a fashion that the specific individual or entity from whom they were obtained can be readily determined.

5. If you do not produce any document herein requested under a claim of privilege, work produce, or other ground of non production, please submit in lieu of such document a written statement which:

- (a) specifies the privilege, work product, or other asserted ground of non-production;
- (b) describes the nature and general topic of the documents to the extent possible in a manner consistent with the privilege, work product, or other asserted ground of non production;
- (c) identifies the person or persons who prepared the documents and, if applicable, the person or persons to whom the document was sent;
- (d) identifies each other person who has seen or had possession of the documents; and

- (e) specifies the date on which the document was prepared by the author and/or received by the addressees.

6. If any document was, but no longer is, in your custody or control, state whether it has been lost, destroyed, transferred, or otherwise disposed of, and in each instance, identify the document as completely as possible, including without limitation, the author(s), addressee(s), any person(s) who saw the document, the date of the document and date when the document was received, the subject matter of the document, and the circumstances surrounding the disposition of the document and the date that disposition occurred.

III. DOCUMENTS REQUESTED

Provide copies of:

1. All poll book pages from the 2004 General Election containing the names of those individuals listed on the attached Exhibit 1, whether or not a signature appears next to the respective individual's name.
2. All absentee ballot envelopes from the 2004 General Election returned by those individuals listed on the attached Exhibit 1.
3. All provisional ballot envelopes from the 2004 General Election submitted by those individuals listed on the attached Exhibit 1.

LAST	FIRST	MIDDLE	VOTER ID	PRECINCT
FELONS				
Aitken	Stasha	S	990693672	2809
Anderson	Marcus	S	990681862	1779
Archie	Matthew	G	990640885	997
Armstrong	Jeffrey	Allen	10129052	1250
Austin	Willie	J	40199021	1748
Bailey	Thomas	Myron	970357131	1059
Ballard	Lester		30365488	911
Barnett	Myra	H	20043997	1932
Beck	William	H	990644823	2353
Bjornson	Gregory	T	960146221	1860
Blanton	Morris	Lee	880252089	1636
Bloomdahl	Stephen	E	950075970	2220
Boggs	Kail	A	990656526	2750
Bowman	Frances	Geneva	231053	2820
Brown	Veronica		930188506	1834
Brown	James		950540231	1896
Brown	Joann	L	990654147	3416
Brunnell	Donette	Suzanne	960469399	2510
Burke	Shane	Antone	950969563	510
Burns	Gloria	Jean	960928199	1481
Bush	A	C	921193777	3265
Bushnell	Keith	S	990620544	2932
Buxton	David	Harrison	950663952	1734
Cameron	Kenneth	M	40027203	1527
Cann	Robert	C	910139118	2845
Carrell	Curtis	Eugene	960599969	125
Chambers	Violeta	L	10341850	798
Charney	Ken	W	961057094	1247
Clack	Mario	Toure	950117117	1633
Clark	Lisa	Marie	920166768	1883
Clay	Willie	H	980204081	1215
Clemens	Tyron	M	990654061	508
Clewis	Valerie	Lynn	980171710	2842
Coleman	Atwell	Brady	683949	1473
Compton	Jack	Martin	980420264	3317
Cory	Oliver		40062548	1437
Crawford	Robert	A	40372717	2544
Davis	Mark	A	714577	2658
Dawson	Diana	I	990597129	31
Derrenger	Bryan	Scott	980369862	258
Dey	Teresa	Marie	970078568	2224
Diaz	Bianca	Jesse	20462833	2639

Dillard	John	T	10431166	1582
Doucette	David	H	990638883	1602
Dowell	Omisher		970006052	1618
Dudley	Roy	V	990685738	327
Edmon	Lorenzo		970299327	1574
Ellis	Richard	Jaime	970425349	584
Emanuel	Michael	J	990603804	3021
Erickson	John	W	930343722	945
Erlandson	Leigh	M	990501742	1450
Evans	Jeremy	R	40339761	2544
Evans	Beverly	J	720408031	1781
Evans	Lyle	G	961081181	272
Evans	Roger	Craig	990691858	2836
Foster	Herman	Glenn	960124774	1859
Frederick	Russell	L	990613996	1398
Frint	Dale	Ralph	950337729	1006
Furedy	Michael	J	201758	2467
George	Johnny	R	565202	1570
Gorman	David	Scott	990589004	3473
Graham	Anthony	R	950085223	145
Greer	Ronnie	T	990652249	1875
Gropper	Angela	M	30218621	1842
Guy	Marcus	L	990633389	2544
Haisley	Melvin		10290180	1927
Hall	Michael	Eugene	250813	658
Hamilton	Zachary		990657726	392
Harris	Justin	T	20423714	3081
Harris	Carmaletha	A	830405666	1616
Harrison	Sophia	A	30189868	1488
Haywood	Leonard	L	30212126	2549
Hendrix	Tina	L	30193296	1572
Hicks	Derek	Kalani	950862688	42
Hines	Julie	L	990598597	866
Houck	Jacqueline	E	990679267	2212
Howard	Gary	A	990598912	1823
Jackson	Edward	Isaac	950602716	880
Jackson	Steven	R	960291581	1947
Jacobson	Joseph	Shay	960084250	2466
Jamerson	Joyce		940206758	1638
Johnson	Heather	Jo	920065601	2277
Kalinowski	Paul	L	990631988	3267
Karpman	Steven	R	20168561	3326
Kellie	James	W	950771194	3112
Kidd	Ora	Otis	10147751	1593
Knox	Thomas		960880013	1895

Krassner	Krista	W	30305558	1559
Larsen	Gareth	B	930151645	2618
Larson	Kathleen	Marie	940397367	2540
Lasseson	Steven	J	644986	3238
Lawseth	Linda	M	40387251	2370
Leahy	Peter	Shannon	950432373	2317
Lealofi	Maleko	Tepatasi	960919491	3159
Lentz	Dawna	RC	30351487	2229
Liming	Robert	S	40327207	1855
Long	Lawrence	E	30125436	1278
Madsen	Perry	Jay	30007034	238
Marcoe	Scott	D	840307506	1480
Mason	Kenneth	L	20366401	1607
Mathews	Willie	Jo	960168798	1497
Mayo	Jeffrey	E	248479	2590
McDougall	Shane	Thomas	950622881	426
Meredith	Dean	James	960278330	149
Miller	Sara	A	30148606	3223
Miller	Andrew	A	40200843	2108
Miller	Karl	Shawn	920744931	28
Mills	Robert	Alexander	980076318	647
Monday	Kevin	L	40293981	3027
Moore	Royal	Ray	970695486	1430
Moore	Johnnie	L	990596326	2548
Morgan	Eagle	Bear	960442598	1360
Morrison	Paulette	Margurite	10203201	1643
Myles	Roger	A	30552130	2993
Mylle	Robert	Henry	950434597	1256
Neal	Peter	J	960189264	967
Nelson	Christopher	James	30400879	2330
Newby	Robert	B	940122988	1159
Newman	Terri	L	960381670	3395
North	Dennis	H	990626395	1844
Olson	Edgar	Paul	980099890	2719
Owens	Burte	T	880032933	789
Oyer	Michael	James	960731735	3060
Parker	Pamela	M	990610754	2365
Patrick	Otis	Charles	950952008	1488
Perez	Debra	M	990585417	1854
Pete	Regina	L	40203214	3036
Pine	Charles	W	990386463	543
Powell	Kenneth	Beirne	10274818	1018
Presnell	Carolyn	M	990604040	2033
Rama	Leighton	C	950815761	2677
Reasor	Angela	L	10255872	1520

Reynolds	Michael	Joseph	30538617	348
Richardson	Larry	F	980311201	86
Riggins	Joyce	M	960920261	1801
Roddy	James	J	910052454	2558
Rogers	Chris	Michael	960462203	3052
Sadler	Gary	W	921374038	3018
Savare	Barbara	A	990289522	1643
Schroeder	Rodney	Dale	960702310	981
Seegmiller	Gregg	Scott	860387913	1127
Sheehan	Patrick	Murphy	970561960	208
Simonton	Cathy	Jo	10256232	231
Skillings	Cheryl	M	276928	396
Snipes	Janice	Marie	347353	1903
Spruitenburg	Frederick	J	30344561	1834
Stapp	Terry	Lee	930406091	279
Stewart	Ricky	L	10438039	411
Stewart	Fred	Gregory	960260287	2363
Story	Kern	E	921842503	1824
Stringer	William	R	990435359	1714
Swain	Tyshon	C	990664227	1882
Taylor	Jeff	M	960564898	1475
Terrell	Alma	Simone	950565756	1488
Thomason	Glenn	J	40126317	1352
Thurston	Rickey	D	426857	1838
Tingelstad	Mark	Alan	10213355	2539
Travis	Edna	D	990651602	1600
Tymony	Jeffrey	Conrad	960285131	1910
Walz	John	Martin	950910542	25
Warren	Ronald	J	950722860	3141
Washington	Edward		990032513	25
Weatherly	Deshawn	L	30026551	1898
Welsh	Arthur	B	40144161	1749
West	Thomas	J	990653528	2326
Wetrick	Henry	W	40272259	1823
Wheeler	Ronald	E	881582384	610
Whitfield	Sylvester		940745748	3092
Wiley	Raymond	L	980501574	283
Williams	Richard	D	830118071	481
Williams	Lisa	J	910178075	1592
Williams	Teresa	M	990316252	1251
Williams	Larry	D	990651677	842
Williamson	Tammy	M	990664419	1639
Wollmuth	David	Aaron	10463254	1072

NON-CITIZENS				
Anderson	Ming	Y	30437420	2686
Chen	Chun	C	990598675	2052
DUAL IN-STATE				
Bligh	Shari	D	20273721	3281
Bligh	Shari	D	990650307	3281
Brown	Patricia	A	710327149	194
Brown	Patricia	A	710448825	224
Diaz	Darlene		157279	3321
Diaz	Darlene		990135789	3321
Fuller	George	R	40006249	1942
Fuller	George	R	40051368	1942
Harleman	Thomas	J	880400568	37
Harleman	Thomas	J	712220627	37
Mendiola	Jennifer	C	30055136	233
Mendiola	Jennifer	C	40325204	233
Nelson	Tara	B	245941	2371
Nelson	Tara	Brooke	10197813	2371
Prince	Michael	R	30267648	1759
Prince	Michael	R	20040467	1759
Sakimae	Sarah	M	30003861	2282
Sakimae	Sarah	M	30064071	2282
Ungrich	Frederick	B	40099921	1844
Ungrich	Frederick	B	720569	1844
DUAL MULTI-STATE				
Brooks	Brian	E	30331940	2358
Hartman	Artrese		940560390	3393
Heidmiller	John	William	990463921	1438
Shaffer	Judith	A	910389394	58

DECEASED				
Bartow	G	Horace	800585937	660
Burke	Larry	P	217051	213278
Carr	Shirley	A	49466	25143
Chalfa	Dulcie	Mae	870050909	2718
Coffey	Mary	S	880913000	2361
Convey	John	W	820312368	2377
Courneya	James	M	712609010	83
Cullen	Laurance	E	722732502	3153
Cuykendall	Betty	Lou	710848602	993
Dansby	James	W	214185	2038
Eberhardt	Elaine	A	20006773	3293
Engel	M	Jane	713135135	98
Englund	Eric	P	711582754	667
Fey	John	A	721418049	2540
Forward	Lola	M	900067925	1593
Foster	Charles	F	75041	2011
Fuda	Joseph		721356744	3310
Gilge	Vay	Jeanne	711740414	2748
Hayward	Charles	B	65204	28437
Holmgren	Charlette	M	800678862	1499
Irwin	Robert	J	721648303	1058
Jackson	John		20438363	2645
Johnson	George	E	12415503	89.1
Kershner	Thelma	P	339255	2011
Kinnune	Charles	H	710716803	546
Lane	Gertrude	B	159921	2461
Laplant	Clayton	R	760977136	2501
MacDonald	Joan	D	740356950	2767
McFarland	Earl	D	760385549	3334
Meacham	Alice	J	860277999	283
Peterson	Gary	G	950244186	3378
Price	Rosanna		723164460	2293
Raymond	Patricia	M	247628	213240
Richardson	Caroline	G	820158741	1740
Rogers	Robert	Frank	990505411	2217
Sivakumaran	Vimaladevi		20054697	444
Stretton	Gladys	H	721975908	1272
Stroupe	Martha	Cantrell	310090	395416
Swanson	Eric	B	801359329	201
Tracy	Mildred	L	239645	27324
Travis	Richard	E	721361063	1509
Turner	Eugene	E	237743	2019
Vego	Diana	L	970293159	937
Ware	Beverly	M	19263	114112

Waters	Donald	R	723088101	2304
Wickman	Torrey	L	10150	28419
Witte	Anne	M	710754357	3215
Yant	Philip	A	283051	25151
Zemko	Maxine	M	725426011	2512
Martin	Lawrence	E	921786093	2832