

The Honorable John E. Bridges

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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
Seattle, WA 98101

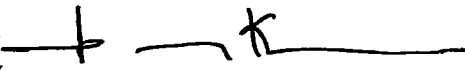
9 DATE: Wednesday, May 18, 2005

10 TIME: 9:00 a.m. PST

11
12 To produce and permit inspection and copying of the documents or objects in
13 accordance with Attachment A at the place, date, and time specified above, at the request
14 of the Petitioners in the above-entitled cause. If documents or objects are received at the
15 above specified location by the specified date and time, or in advance at a mutually agreed
16 upon time and place, your attendance is waived.

17 DATED this 10th day of May, 2005.

18 Davis Wright Tremaine LLP
19 Attorneys for Petitioners

20 By 

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

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

To the extent not already produced in response to the Subpoena Duces Tecum dated April 15, 2005, produce 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.

EXHIBIT 1

Last Name	First Name	Address	City	Zip	Vote ID
Kemmer	Robert	25327 Baker St	Black Diamond	98010	922149429
Ellingson	Christy	32117 Union Dr	Black Diamond	98010	730116284
Chlerno	Holy Elizabeth	612 NW 50th St	Seattle	98107	
Scranton	Mari	9525 NE 180th St #206	Bothell	98011	980554759
Steel (reg. as Saunders)	April	9406 NE 149th Ct Pl W	Bothell	98011	
Lociero	Mark	11911--87th Ave S	Seattle	98178	
Ferleman	Dennis	14906 SE 46th Ct	Bellevue	98006	
Hirsch	Doris	14831 Se 51st St	Bellevue	98006	
Holmes	James	1248 A St #328	Auburn	98002	
Carler	Sarah	28137--236th Ave	Seattle	98038	721288307
Turner	Kenneth	1612 N 55th St	Seattle	98103	877824
Demers	Michael	11605 140th Ave SE	Renton	98089	910189531
Flojo	Beatriz	14708 SE 274th Ct	Kent	98042	990698045
Bingham	Wendolowyn	11400 Ne 132nd St #102	Kirkland	98034	990626
Wallace	James	14324 109th Ave NE	Kirkland	98034	10427185
Greiner	Brandy	14361 109th Ave NE	Kirkland	98034	950025263
Yandilia	Sara A.	11400 NE 132nd St #105	Kirkland	98034	99095530
Bukovcan	Samyr	11400 NE 132nd St k-204	Kirkland	98034	40048464
Bukovcan	Niknaz	16626 Jaunita Dr NE #201-D	Kirkland	98028	40002537
Coogan	Sean	11400 NE 132nd St	Kirkland	98034	30337344
Okane	Peter	7449 W Mercer Way	Mercer Island	98040	990600193
Martinez	Rebecca	750 N 143rd St #102	Seattle	98133	30078012
Bauhofer	Brittnay	13717 Linden Ave N #227	Seattle	98133	20324325
Morales	Cynthia	13520 Linden Ave N #553	Seattle	98133	990671009
Swift	Timothy E.	13407 Greenwood Ave N	Seattle	98133	99060914
Koster	Krista	11032 NE 41st Dr	Mercer Island	98040	10215595
Walker	Jeffrey	20137 128th Ave SE	Kent	98031	99064488
Hunter	Phillip	18834 120th Ave SE	Renton	98058	990596589
O'Leary	K	4501 12th Ave S	Seattle	98108	920252800
Carlson	Eric	4152 13th Ave S	Seattle	98108	860245892
Welsh	Jeffrey Raymond	1301 E Madison St #1	Seattle	98122	960708121
Steen	Dirk	1412 Summitt Ave #570	Seattle	98122	960326032
shibuya	Tadao	922 20th Ave	Seattle	98122	720255235
Castillo	Danielle	15405 Des Moines Memorial. Dr. S #A204	Burien	98148	487872

Phan	Rang	30185 Holly St	Seattle	98108	961118506
Palmiter	Katherine	10825 178th Pl NE	Redmond	98052	990697452
Moore	Annette	11605 159th Ct NE	Redmond	98052	990698014
Timm	Danielle	15817 90th St	Redmond	98052	
Sjoberg	Erik	10206 179th Ave	Redmond	98052	990652863
Zhu	Cheng	17814 10st Ct	Redmond	98052	990690257
Tisdale	Vincent	127 S 331 St #310	Federal Way	98003	990691619
Mathews	Erica	451 S 328 St #25	Federal Way	98003	990677110
Iougher	Robert Frances	516 S 331 St Pl	Federal Way	98003	730165
Watson	James T.	925 SW Campus Dr #12-D1	Federal Way	98023	40363262
Miller	Vannessa	125 S 330th St	Federal Way	98005	990606446
Brown	Kith or Kleith	11040 SE 224th Pl	Kent	98031	
Fraissinet	Jason	2240 Benson Rd	Kent	98031	30236262
Kaur	Surinder	23353 105 Ave SE	Kent	98031	642282
Meyer	Travis	10531 SE 233 Pl	Kent	98031	9906542725
Kaur	Surjit	23353 105th Ave SE	Kent	98031	990681090
Gaudamuz	Marion	10811 SE 236th St	Kent	98031	20092866
Buttke	Jean	10531 SE 236th St	Kent	98031	820080254
Buttke	Duane	10531 SE 229th Pl	Kent	98031	820049403
Fiddler	Joseph	22410 Benson Rd SE	Kent	98031	3004329
Baker	Nathan	2804 R Lake Sammamish Pkwy NE	Sammamish	98074	990685393
Gibson	Martha	720 E Lake Sammamish Rd NE	Sammamish	98074	980601536
Brendal	Paul	13226 97th Ave	Kirkland	98034	40117865
Dykeman	Monica	402 21st SE #73	Auburn	98002	990652208
Engelhardt	Ron	2616 Pike St SE	Auburn	98002	921771584
Flynn	Margaret	942 19th Ave E	Seattle	98002	930008915
Rehrmann	Peter	1154 21st	Seattle		10286522
Fletcher	Drew	7723 18th Ave SW	Seattle	98106	40204679
Bustos	Patricia	1200 Boylston Ave	Seattle	98101	880308980
Poust	Rachel	768 Bellevue Ave E	Seattle	98102	99680357
Hayes	Mathew	1336 Lakeview Blvd E	Seattle	98102	990687459
Stadtmiller	Trevor	1073 Summitt Ave E	Seattle	98102	33010152
Holland	Mary	6329 S 238th Pl	Kent	98032	30227743
Kuchmiy	Fedor	6329 S 41st Ct	Auburn	98001	20307463
Voellgren	Sara	29922 53rd Pl S	Auburn	98001	970536655
Hayes	Kelly	121st Pl SE	Auburn	98001	920747469
Soiberg	Lance	22214 9th Ave S	Des Moines		20107197

Smith	Melissa	29913 53rd Pl S	Auburn	98001	99040481
Storms	Don	29854 45th Pl S	Auburn	98001	990651938
Wang	Rosa	5217 S 298th Ct	Auburn	98001	950179503
Fulmer	Terese	29311 33rd Ave	Auburn	98001	990638825
Danichuck	Yelizaveto	30058 41st Ave S	Auburn	98001	990642848
Metje	Michael	3321 S 300th Pl	Auburn	98001	10137454
Harris	Bryan	21032 Walnut Ave S	Seattle	98116	890253474
Rubio	Esteban	717 E Denny Way#3c	Seattle	98122	30447816
Graumans	Raissa	803 E Denny Way	Seattle	98122	970543091
Bailey	Katherine	2536 Angeline st	Seattle	98108	720922975
Humphrey	Jennifer	8446 84th Ave S	Seattle	98118	20252162
Goodrum	Damon	2434 SW 349th Pl	Federal Way	98023	950934468
Saini	Romesh	34621 8th Ave	Federal Way	98023	921515545
Nalder	Annette				78006695
Sofie	Veronique	34414 28th Pl SW	Federal Way	98023	860394626
King	April	2412 S 116th	Seattle	98168	961022941
Diriye	Sahro	100 Melrose Ave 811	Seattle	98102	20131390
Swanberg	Diana	2043 S 244th	Des Moines	98198	880382411
Zhou	Jian-hua	4236 11th Ave NE	Seattle	98015	990668520
Jazayeri	Amann A.	4262 8th Ave	Seattle	98105	990654200
Vernon	Odessia	5017 30th Ave. S.	Seattle	98108	840388104
Kido	Nancy	22024 Military Rd S.	Sea-Tac	98198	990668350
Truly	Carol	10522 NE 187th St.	Bothell	98011	900411553
Day	Richard	10619 E. Riverside Dr.	Bothell	98011	990614694
Matthews	Ernest	10217 51 St Ave. S.	Tukwila	98178	10161916
Killgore	Gary	11006 Riviera Pl. NE	Seattle	98125	990690744
Flanagan	James	16125 4th Ave. NE	Duvall	98019	950576626
Calnan	Jeffrey	15323 287th Ave. NE	Duvall	98019	990679893
Milender	Charles	30832 NE 116th St.	Carnation	98014	970565345
Byer	Robin	14311 274th Pl. NE	Duvall	98019	980248496
Hong	Darryl	27327 NE Big Rock Road	Duvall	98019	921525141
McEnany	Mary	13032 291st Ave. NE	Duvall	98019	20433141
Wyles	Rick	7524 25th Ave. SW #S-307	Seattle	98126	990620805
Rehrmann	Pete	1154 21st Ave. E.	Seattle	98112	10288522
Taylor	Roseveit	32207 11th Pl. S. #36	Federal Way	98003	40232273
Thorne	Douglas	28100 193rd Ave. SE	Kent	98042	710882860
Gamble	Irwin	2108 E. Pine St.	Seattle	98122	40128573

Burkholder	Devin	4822 252nd Pl.	Kent	98032	30167538
Hey	Kenneth	3209 SW Juneau St.	Seattle	98126	980035921
West	Cindy	3671 W. Lake Sammamish Pkwy. NE #145	Redmond	98052	711204717
Lin	Gary	1911 NE 176th Pl.	Shoreline	98155	30366531
Bayron	Christopher	104 Bent Tree Lane	Pacific	98047	960365089
Chen	Jerome	4746 11th Ave. NE, #409	Seattle	98105	20131349
Pazhavia	Angie	10011 NE 1st E310	Bellevue	98004	40329277
Mcfarlin	Robert	5612 34th Ave. SW	Seattle	98126	30411934
Sternberg	Corinne	2553 5th Ave. N.	Seattle	98109	860188961
Ross	Michael	2119 2nd Ave.	Seattle	98121	880279777
Bunker	Lon	1902 2nd Ave.	Seattle	98101	990643784
Siedzieski	Walter	4744 12th Ave. NE	Seattle	98105	850624
Porter	Jason	727 100th Ave. NE	Bellevue	98024	40218114
Flynn	Margaret	942 19th Ave. E.	Seattle	98112	930008915
Valencia	Hector, Jr.	11100 SE 176th St., #S304	Renton	98055	990672053
Morales	Cynthia	13520 Linden Ave. N.	Seattle	98133	990671009
Greenwood	Deanna	1754 26th Ave NE	Issaquah	98029	40025421
Kasprzak	Chris	1605 Huckleberry Circle	Issaquah	98029	970395865
Phillips	Karen	2657 Thorndyke Ave #2	Issaquah	98029	20159502
Woo Hysing	Dawn	1693 30th Ave NE	Issaquah	98020	990681644
Boyd	Ben	1509 2nd Ave. W.	Seattle	98119	30133058