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SUPERIOR COURT OF WASHINGTON

COUNTY OF KING

Washington Election Integrity Coalition)
United, et. al,) Case No. 21-2-12603-7 KNT

Plaintiffs,)

v.)

Julie Wise, et al.,)

Defendants,)

**PLAINTIFF WEICU’S INTERROGATORIES
TO DEFENDANT KING COUNTY**

SET NO. 1

Action Filed: 9/22/2021
Trial Date: 10/23/2023

**PROPOUNDING PARTY: PLAINTIFF WASHINGTON ELECTION INTEGRITY
COALITION UNITED**

RESPONDING PARTY: DEFENDANT KING COUNTY

SET NUMBER: ONE

Pursuant to CR 33, Washington Election Integrity Coalition United (“WEiCU”) requests that
you answer the following set of Interrogatories fully and under oath. You are to serve your written re-
sponses to the interrogatories, with verification, on counsel for WEiCU within thirty (30) days after
service.

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**PLAINTIFF WEICU’S INTERROGATORIES
TO DEFENDANT KING COUNTY**

Virginia P. Shogren, P.C.
961 Oak Court
Sequim WA 98382
360-461-5551

SET NO. 1

DEFINITIONS

A. "YOU" and "YOUR" shall mean Defendant King County.

B. "PLAINTIFF" shall mean PLAINTIFF WASHINGTON ELECTION INTEGRITY COALITION UNITED.

INTERROGATORIES

INTERROGATORY NO. 1: For each denial in YOUR response to PLAINTIFF WEICU'S REQUESTS FOR ADMISSION TO DEFENDANT KING COUNTY, SET NO. 1, served herewith, please state all facts in support of YOUR denial.

INTERROGATORY NO. 2: For each affirmative defense in the AMENDED KING COUNTY DEFENDANT'S ANSWER TO PLAINTIFF'S COMPLAINT AND COUNTERCLAIM AND JURY DEMAND, filed January 6, 2023, please state all facts in support of YOUR affirmative defense.

INTERROGATORY NO. 3: Please list the names of all persons and their associated employer responsible for the ongoing operation, maintenance, expansion, and/or upkeep of any component of the electronic network used to conduct elections in King County for the period commencing January 1, 2020 to the present.

INTERROGATORY NO. 4: Please list the names of all persons and their associated employer responsible for administering email for King County Elections for the period commencing January 1, 2020 to the present.

INTERROGATORY NO. 5: Please list the names of all persons and their associated employer responsible for the maintenance of computer generated records for King County Elections for the period commencing January 1, 2020 to the present.

VIRGINIA P. SHOGREN, P.C.



By: Virginia P. Shogren, Esq.
WSBA No. 33939
961 W. Oak Court
Sequim, WA 98382
360-461-5551
vshogren@gmail.com
Attorney for Plaintiff WEICU

Dated: April 7, 2023

DECLARATION OF SERVICE

I declare under penalty of perjury under the laws of the State of Washington that on April 7, 2023, a true and correct copy of the following documents were served upon the parties listed below via the method indicated:

PLAINTIFF WEICU’S INTERROGATORIES TO DEFENDANT KING COUNTY, SET NO. 1

Counsel for Defendants:

Ann M. Summers

Via email: ann.summers@kingcounty.gov

David J.W. Hackett

Via email: david.hackett@kingcounty.gov

Mari Isaacson

Via email: mari.isaacson@kingcounty.gov

Dated: April 7, 2023

s/ Virginia P. Shogren

Virginia P. Shogren

961 W. Oak Court

Sequim, WA 98382

360-461-5551

PLAINTIFF WEICU’S INTERROGATORIES
TO DEFENDANT KING COUNTY

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SET NO. 1