1 2 3 4 5 6 7 SUPERIOR COURT OF WASHINGTON 8 **COUNTY OF KING** 9 10 Washington Election Integrity Coalition Case No. 21-2-12603-7 KNT United, et. al, 11 Plaintiffs, PLAINTIFF WEICU'S REQUEST FOR PRODUCTION TO KING COUNTY v. **12** Julie Wise, et al., 13 SET NO. 1 Defendants, 14 Action Filed: 9/22/2021 Trial Date: 10/23/2023 15 16 **17** PROPOUNDING PARTY: PLAINTIFF WASHINGTON ELECTION INTEGRITY **COALITION UNITED** 18 RESPONDING PARTY: DEFENDANT KING COUNTY 19 20 SET NUMBER: ONE 21 Pursuant to CR 34, WEICU requests that Defendant King County produce true and correct 22 electronic copies of the following items in Defendant's possession, custody or control within thirty 23 (30) days after service of this request to the following email address: vshogren@gmail.com. 24 25 **26** 27 Virginia P. Shogren, P.C. 961 Oak Court Sequim WA 98382 360-461-5551 PLAINTIFF WEICU'S REQUEST FOR 28 PRODUCTION TO KING COUNTY

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SET NO. 1

DEFINITIONS

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

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

REQUEST FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: For each denial in YOUR response to PLAINTIFF WEICU'S REQUESTS FOR ADMISSION TO DEFENDANT KING COUNTY, SET NO. 1, served herewith, any and all documents, including but not limited to, all notes, correspondence, communications, memoranda, reports, instructions, lists, forms, files, emails, text messages, screen shots, and/or voice mail recordings in support of YOUR denial.

REQUEST FOR PRODUCTION NO. 2: Any and all documents, including but not limited to, all notes, correspondence, communications, memoranda, reports, instructions, lists, forms, files, emails, text messages, screen shots, voice mail recordings, and postings on the internet, of communications between or among any of YOUR employee(s), representative(s), official(s), temporary worker(s), and/or agent(s), on the one hand, and any employee(s), representative(s), official(s), temporary worker(s), and/or agent(s) of the Washington State Secretary of State, on the other hand, for the period commencing September 1, 2021 to the present.

VIRGINIA P. SHOGREN, P.C.

Dated: April 7, 2023

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By: Virginia P. Shogren, Esq.

WSBA No. 33939 961 W. Oak Court Sequim, WA 98382 vshogren@gmail.com

Attorney for Plaintiff WEICU

27 | PLAINTIFF WEICU'S REQUEST FOR PRODUCTION TO KING COUNTY

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

SET NO. 1

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1	DECLARATION OF SERVICE
2 3	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:
4	PLAINTIFF WEICU'S REQUEST FOR PRODUCTION TO KING COUNTY, SET NO. 1
5	Counsel for Defendants:
6	Ann M. Summers
7	Via email: ann.summers@kingcounty.gov David J.W. Hackett
8	Via email: david.hackett@kingcounty.gov Mari Isaacson
9	Via email: mari.isaacson@kingcounty.gov
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11	Dated: April 7, 2023 <u>s/Virginia P. Shogren</u>
12	Virginia P. Shogren
13	961 W. Oak Court Sequim, WA 98382
14	360-461-5551
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PLAINTIFF WEICU'S REQUEST FOR PRODUCTION TO KING COUNTY

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

SET NO. 1

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