



**DEFINITIONS**

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

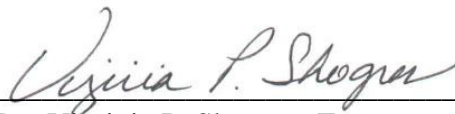
B. "PLAINTIFF" shall mean PLAINTIFF WASHINGTON ELECTION INTEGRITY COALITION UNITED.

**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

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

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 REQUEST FOR PRODUCTION TO KING COUNTY, SET NO. 1

Counsel for Defendants:

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Dated: April 7, 2023

s/ Virginia P. Shogren

Virginia P. Shogren

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Sequim, WA 98382

360-461-5551

PLAINTIFF WEICU’S REQUEST FOR PRODUCTION TO KING COUNTY

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SET NO. 1