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The Honorable LeRoy McCullough

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

WASHINGTON ELECTION INTEGRITY)
COALITION UNITED, a Washington State)
Nonprofit Corporation; DOUG BASLER;)
HOWARD FERGUSON; DIANA BASS;)
TIMOFEY SAMOYLENKO; MARY)
HALLOWELL; SAMANTHA BUCARI;)
RONALD STEWART; LYDIA ZIBIN;)
CATHERIN DODSON,)

No. 21-2-12603-7 KNT

DEFENDANT KING COUNTY'S
RESPONSES TO PLAINTIFF
WEICU'S REQUEST FOR
PRODUCTION OF DOCUMENTS

Plaintiffs,

v.

SET NO. 1

JULIE WISE, Directory of King County)
Elections; KING COUNTY, and DOES)
1-30, inclusive,)

Defendants,

and

JULIE WISE, Directory of King County)
Elections; KING COUNTY,)

Counterclaimants,

v.

WASHINGTON ELECTION INTEGRITY)
COALITION UNITED, a Washington State)
Nonprofit Corporation,)

Counterclaim Defendant.)

DEFENDANT KING COUNTY'S RESPONSES TO
PLAINTIFF WEICU'S REQUEST FOR
PRODUCTION OF DOCUMENTS - 1

Leesa Manion (she/her), Prosecuting Attorney
CIVIL DIVISION, Litigation Section
701 5th Avenue, Suite 600
Seattle, WA, 98104
(206) 477-1120 / FAX (206) 296-0191

1 Defendant King County responds to Plaintiff WEICU's Request for Production of
2 Documents to Defendant King County as follows:

3 **I. GENERAL OBJECTIONS**

- 4 1. King County objects to the Discovery Requests to the extent that they request information or
5 documents protected by the attorney-client privilege, joint defense privilege, work product
6 doctrine, or any other applicable privilege or protection.
- 7 2. King County objects to each Definition or Instruction that purports to impose obligations
8 different from, or in excess of, those set forth in the Federal Rules of Civil Procedure or the
9 Local Rules of this court.
- 10 3. King County objects to the Discovery Requests to the extent they are overbroad, unduly
11 burdensome, or seek documents or information that is neither relevant to the subject matter of
12 this litigation nor reasonably calculated to lead to the discovery of admissible evidence.
- 13 4. King County objects to the Discovery Requests to the extent they seek information already in
14 the Plaintiff's possession or to which the Plaintiff has equal access.
- 15 5. King County objects to each Request that does not identify the time period for which discovery
16 is sought or seeks information regarding events outside the relevant time period.

17
18 RESPONSE TO REQUEST FOR PRODUCTION NO. 1: The denials in response to
19 Plaintiff WEICU's Request for Admission to Defendant King County, Set No. 1, are based on
20 publicly available Washington cases, statutes, and the Washington State Constitution equally
21 available to Plaintiff.

22 RESPONSE TO REQUEST FOR PRODUCTION NO. 2: King County objects to Request
23 for Production No. 2 as overly broad and unduly burdensome and outside CR 26. King County

1 also objects to the extent this request seeks attorney-client privileged information or work product.
2 Communications between King County employees and employees of the Washington State
3 Secretary of State from September 1, 2021, to present have no relevance to WEICU's Public
4 Records Act cause of action in this matter.

5
6 DATED this 5th day of May, 2023.

7 LEESA MANION
8 King County Prosecuting Attorney

9 By: /s/ Ann Summers
10 ANN M. SUMMERS, WSBA #21509
11 DAVID J. HACKETT, WSBA #21236
12 MARI ISAACSON, WSBA #42945
13 Senior Deputy Prosecuting Attorneys
14 Attorneys for Defendants
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20 mari.isaacson@kingcounty.gov
21
22
23

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on May 5, 2023, I served a true and correct copy of the foregoing
3 document to the following via e-service and/or email:

4 Virginia Pearson Shogren
5 VIRGINIA SHOGREN PC
6 961 W Oak Court
7 Sequim, WA 98382
8 vshogren@gmail.com
9 *Attorney for Washington Election Integrity Coalition United*

10 Kevin J. Hamilton, WSBA No. 15648
11 Amanda J. Beane, WSBA No. 33070
12 Reina A. Almon-Griffin, WSBA No. 54651
13 Perkins Coie LLP
14 1201 Third Avenue, Suite 4900
15 Seattle, WA 98101-3099
16 KHamilton@perkinscoie.com
17 ABeane@perkinscoie.com
18 RAlmon-Griffin@perkinscoie.com
19 *Attorneys for Intervenor Washington State Democratic Central Committee*

20 I further served a true and correct copy by USPS First Class Mail to the following:

21 Doug Basler
22 1851 Central Place S. Suite 123
23 Kent, WA 98032
doug@eztvspots.com
Plaintiff, Pro Se

Timofey Samoylenko
1921 R. Street NE
Auburn, WA 98002
freshtrend13@gmail.com
Plaintiff, Pro Se

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 5th day of May, 2023.

s/Kris Bridgman
KRIS BRIDGMAN
Paralegal II – Litigation Section
King County Prosecuting Attorney's Office