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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 INTERROGATORIES

Plaintiffs,

SET NO. 1

v.

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.)

1 Defendant King County responds to Plaintiff WEICU's Interrogatories to Defendant King
2 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 pursuant to CR 33(d) to the extent the Discovery Requests seek
11 information that may be derived from documents being produced in this action.
- 12 4. King County objects to the Discovery Requests to the extent they are overbroad, unduly
13 burdensome, or seek documents or information that is neither relevant to the subject matter of
14 this litigation nor reasonably calculated to lead to the discovery of admissible evidence.
- 15 5. King County objects to the Discovery Requests to the extent they seek information already in
16 the Plaintiff's possession or to which the Plaintiff has equal access.
- 17 6. King County objects to each Request that does not identify the time period for which discovery
18 is sought or seeks information regarding events outside the relevant time period.

19
20 RESPONSE TO INTERROGATORY NO. 1: See Defendant King County's
21 Responses to WEICU's Request for Admissions.

22 RESPONSE TO INTERROGATORY NO. 2: The facts relevant to Defendant King
23 County's sole affirmative defense to WEICU's Public Records Act claim, that Plaintiff's claims

1 are barred in whole or part by Defendants’ complete compliance with the PRA, are set forth in the
2 Amended King County Defendant’s Answer to Plaintiff’s Complaint and Counterclaim and Jury
3 Demand, and the briefing provided to the courts in this matter. In addition, see the documents
4 attached as exhibits to the Declaration of Devon Lang in Support of Defendant’s motion for
5 summary judgment.

6 RESPONSE TO INTERROGATORY NO. 3: King County objects to Interrogatory No. 3
7 as overly broad and unduly burdensome and outside CR 26. The names of persons operating and
8 maintaining the components of the “electronic network” used to conduct elections in King County
9 from January 1, 2020, to present have no relevance to WEICU’s Public Records Act cause of
10 action in this matter.

11 RESPONSE TO INTERROGATORY NO. 4: King County objects to Interrogatory No. 4
12 as overly broad and unduly burdensome and outside CR 26. The names of persons
13 “administering” email for King County Elections from January 1, 2020, to present have no
14 relevance to WEICU’s Public Records Act cause of action in this matter.

15 RESPONSE TO INTERROGATORY NO. 5: King County objects to Interrogatory No. 5
16 as overly broad and unduly burdensome and outside CR 26. The names of persons maintaining
17 “computer generated records” for King County Elections from January 1, 2020, to present have no
18 relevance to WEICU’s Public Records Act cause of action in this matter.

19 DATED this 5th day of May, 2023.
20

21 LEESA MANION
22 King County Prosecuting Attorney

23 By: /s/ Ann Summers
ANN M. SUMMERS, WSBA #21509
DAVID J. HACKETT, WSBA #21236
MARI ISAACSON, WSBA #42945

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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
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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