

THE HONORABLE TIMOTHY BRADSHAW

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

D.H.,

Plaintiff,

v.

MAYOR EDWARD MURRAY,

Defendant.

NO. 17-2-09152-9 SEA

**SUBPOENA AND NOTICE OF
DEPOSITION TO JEFF READING**

TO: JEFF READING

PURSUANT TO CR 45 of the State of Washington's rules of civil procedure, YOU ARE HEREBY RESPECTFULLY COMMANDED attend and appear for a deposition at the Connelly Law Office located at 506 2nd Ave, Floor 33, Seattle WA 98104 on Thursday April 20, 2017 at 1:30 p.m. unless otherwise agreed and/or stipulated as between the interested parties and deponent in writing.

Pursuant to CR 45, you further HEREBY COMMANDED to produce:

1. Any and all information and/or documents related to your public statements that D.H.'s claim is wrongfully politically motivated.
2. Any and all communications of any form, including text and emails, with Ed Murray since you learned of D.H.'s allegations.

1 3. Any and all communications with anyone, including Sandeep Kaushik,
2 related to D.H.'s claims against Ed Murray.

3
4 **FAILURE TO APPEAR MAY BE DEEMED CONTEMPT OF COURT**

5
6 DATED this 9th day of April, 2017.

7 CONNELLY LAW OFFICES, PLLC

8 *Lincoln C. Beauregard*

9 By _____
10 Lincoln C. Beauregard, WSBA No. 32878
11 Julie A. Kays, WSBA No. 30385
Attorney for Plaintiff

12 L.A. LAW & ASSOCIATES, PLLC

13 *Lawand Anderson*

14 By _____
15 Lawand Anderson, WSBA No. 49012
16 Attorney for Plaintiff

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18 **(c) Protection of Persons Subject to Subpoenas.**

19 (1) A party or an attorney responsible for the issuance and service of a
20 subpoena shall take reasonable steps to avoid imposing undue burden or expense
21 on a person subject to that subpoena. The court shall enforce this duty and impose
upon the party or attorney in breach of this duty an appropriate sanction, which may
include, but is not limited to, lost earnings and a reasonable attorney's fee.

22 (2) (A) A person commanded to produce and permit inspection and
23 copying of designated books, papers, documents or tangible things, or inspection of
premises need not appear in person at the place of production or inspection unless
commanded to appear for deposition, hearing or trial.

24 (B) Subject to subsection (d)(2) of this rule, a person commanded to
25 produce and permit inspection and copying may, within 14 days after service of the
26 subpoena or before the time specified for compliance if such time is less than 14
days after service, serve upon the party or attorney designated in the subpoena

1 written objection to inspection or copying of any or all of the designated materials or
2 of the premises. If objection is made, the party serving the subpoena shall not be
3 entitled to inspect and copy the materials or inspect the premises except pursuant to
4 an order of the court by which the subpoena was issued. If objection has been
5 made, the party serving the subpoena may, upon notice to the person commanded to
6 produce and all other parties, move at any time for an order to compel the production.
Such an order to compel production shall protect any person who is not a party or an
officer of a party from significant expense resulting from the inspection and copying
commanded.

7 (3) (A) On timely motion, the court by which a subpoena was issued shall
quash or modify the subpoena if it:

- 8 (i) fails to allow reasonable time for compliance;
9 (ii) fails to comply with RCW 5.56.010 or subsection (e)(2) of this
rule;
10 (iii) requires disclosure of privileged or other protected matter
11 and no exception or waiver applies; or
12 (iv) subjects a person to undue burden, provided that the court
13 may condition denial of the motion upon a requirement that the subpoenaing party
advance the reasonable cost of producing the books, papers, documents, or tangible
things.

14 (B) If a subpoena

- 15 (i) requires disclosure of a trade secret or other confidential
research, development, or commercial information, or
16 (ii) requires disclosure of an unretained expert's opinion or
17 information not describing specific events or occurrences in dispute and resulting
18 from the expert's study made not at the request of any party, the court may, to protect
19 a person subject to or affected by the subpoena, quash or modify the subpoena or, if
20 the party in whose behalf the subpoena is issued shows a substantial need for the
21 testimony or material that cannot be otherwise met without undue hardship and
assures that the person to whom the subpoena is addressed will be reasonably
compensated, the court may order appearance or production only upon specified
conditions.

22
23 **(d) Duties in Responding to Subpoena.**

24 (1) A person responding to a subpoena to produce documents shall
25 produce them as they are kept in the usual course of business or shall organize and
label them to correspond with the categories in the demand.

26 (2)(A) When information subject to a subpoena is withheld on a claim that it
is privileged or subject to protection as trial preparation materials, the claim shall be

1 made expressly and shall be supported by a description of the nature of the
2 documents, communications, or things not produced that is sufficient to enable the
demanding party to contest the claim.

3 (B) If information produced in response to a subpoena is subject to a claim of
4 privilege or of protection as trial-preparation material, the person making the claim
may notify any party that received the information of the claim and the basis for it.
5 After being notified, a party must promptly return, sequester, or destroy the specified
6 information and any copies it has; must not use or disclose the information until the
claim is resolved; must take reasonable steps to retrieve the information if the party
7 disclosed it before being notified; and may promptly present the information in
8 camera to the court for a determination of the claim. The person responding to the
subpoena must preserve the information until the claim is resolved.