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Objection to Subpoena for Deposition and Records 07-2-02323-2-72

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

MATHEW & STEPHANIE McCLEARY, on their own and on behalf of KELSEY & CARTER McCLEARY, their two children in Washington's public schools; ROBERT & PATTY VENEMA, on their own behalf and on behalf of HALIE & ROBBIE VENEMA, their two children in Washington's public schools; and NETWORK FOR EXCELLENCE IN WASHINGTON SCHOOLS ("NEWS"), a state-wide coalition of community groups, public school districts, and education organizations,

Petitioners,

vs.

STATE OF WASHINGTON,

Respondent.

Hon. John Erlick

No. 07-2-02323-2 SEA

OBJECTION TO SUBPOENA FOR DEPOSITION AND RECORDS


COMES NOW the Pasco School District No. 1, by and through its attorney, Sarah B. Thornton, and hereby objects to the Subpoena for Documents and for Deposition of Records Custodian in the above-captioned case.

These objections are based on CR 26 (b)(1)(A) & (C) and CR 45(c)(1), on the grounds that the scope of the records subpoena is overly broad, unduly burdensome, and inadequate notice was given to produce the requested records. In addition, most of the subject records are

1 obtainable from another source that is more convenient to the Respondent and less burdensome
2 to the Pasco School District, such as the State of Washington Office of the Superintendent of
3 Public Instruction and State Auditor.

4 Furthermore, Pasco School District hereby joins in the motion filed by the Petitioners on
5 January 9, 2009, in support of this motion submitted to the Court.

6
7 DATED this 12th day of January, 2009.

8
9 
10 SARAH B. THORNTON, WSBA No. 25523
11 Attorney for Pasco School District No. 1
12 1215 W. Lewis St.
13 Pasco, WA 99301
14 (509) 546-2816
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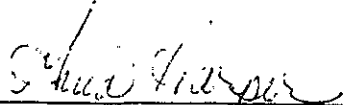
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William G. Clark
Attorney for the State of Washington
800 Fifth Avenue, Suite 2000
Seattle, WA 98104-3188

Thomas F. Ahearne
Attorney for the Petitioners
1111 Third Avenue, Suite 3400
Seattle, WA 98101-3299

I certify under penalty of perjury under the laws of the state of Washington that I am a suitable person over the age of 18 and the foregoing is true and correct.

DATED this 12th day of January, 2009


GINA HARPER