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

OLIVER ORJIAKO,

Petitioner,

v.

CLARK COUNTY WASHINGTON,

Respondent.

No. 16-2-00873-2

**RESPONDENT'S RESPONSE TO
PETITIONER'S SECOND
REQUESTS FOR ADMISSIONS**

TO: PETITIONER

RESPONSES

REQUEST FOR ADMISSION NO. 83: Admit that David Madore sent or received one or more text messages to or from Chris Horne during his period in elected office as County Commissioner/Councilor relating to County governance.

Deny to the extent that it is Mr. Madore's best recollection that there are no text messages to or from the person indicated in this request. As with all requests, Mr. Madore is not in possession of many of the text messages sent or received from his device and has sought the assistance of his phone carrier to obtain messages which are no longer on his device.

REQUEST FOR ADMISSION NO. 84: Admit that David Madore sent or received one

1 or more text messages to or from Chris Cook during his period in elected office as
2 County Commissioner/Councilor relating to County governance.

3 Deny to the extent that it is Mr. Madore's best recollection that there are no
4 text messages to or from the person indicated in this request. As with all
5 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

6 REQUEST FOR ADMISSION NO. 85: Admit that David Madore sent or received one
7 or more text messages to or from Steve Stuart during his period in elected office as
8 County Commissioner/Councilor relating to County governance.

9 Deny to the extent that it is Mr. Madore's best recollection that there are no
10 text messages to or from the person indicated in this request. As with all
11 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

12 REQUEST FOR ADMISSION NO. 86: Admit that David Madore sent or received one
13 or more text messages to or from Don Benton during his period in elected office as
14 County Commissioner/Councilor relating to County governance.

15 Deny to the extent that it is Mr. Madore's best recollection that there are no
16 text messages to or from the person indicated in this request. As with all
17 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

18 REQUEST FOR ADMISSION NO. 87: Admit that David Madore sent or received one
19 or more text messages to or from Vicki Kraft during his period in elected office as
20 County Commissioner/Councilor relating to County governance.

21 Deny to the extent that it is Mr. Madore's best recollection that there are no
22 text messages to or from the person indicated in this request. As with all
23 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

24 REQUEST FOR ADMISSION NO. 88: Admit that David Madore sent or received one
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1 or more text messages to or from Robert Dean during his period in elected office as
2 County Commissioner/Councilor relating to County governance.

3 Deny to the extent that it is Mr. Madore's best recollection that there are no
4 text messages to or from the person indicated in this request. As with all
5 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

6 REQUEST FOR ADMISSION NO. 89: Admit that David Madore sent or received one
7 or more text messages to or from Bill Turlay during his period in elected office as
8 County Commissioner/Councilor relating to County governance.

9 Deny to the extent that it is Mr. Madore's best recollection that there are no
10 text messages to or from the person indicated in this request. As with all
11 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

12 REQUEST FOR ADMISSION NO. 90: Admit that David Madore sent or received one
13 or more text messages to or from Jerry Oliver during his period in elected office as
14 County Commissioner/Councilor relating to County governance.

15 Deny to the extent that it is Mr. Madore's best recollection that there are no
16 text messages to or from the person indicated in this request. As with all
17 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

18 REQUEST FOR ADMISSION NO. 91: Admit that David Madore sent or received one
19 or more text messages to or from Bill Barron during his period in elected office as
20 County Commissioner/Councilor relating to County governance.

21 Deny to the extent that it is Mr. Madore's best recollection that there are no
22 text messages to or from the person indicated in this request. As with all
23 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

24 REQUEST FOR ADMISSION NO. 92: Admit that David Madore sent or received one
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1 or more text messages to or from Clyde Holland during his period in elected office as
2 County Commissioner/Councilor relating to County governance.

3 Deny to the extent that it is Mr. Madore's best recollection that there are no
4 text messages to or from the person indicated in this request. As with all
5 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

6 REQUEST FOR ADMISSION NO.93: Admit that David Madore sent or received one
7 or more text messages to or from Ken Fisher during his period in elected office as
8 County Commissioner/Councilor relating to County governance.

9 Deny to the extent that it is Mr. Madore's best recollection that there are no
10 text messages to or from the person indicated in this request. As with all
11 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

12 REQUEST FOR ADMISSION NO. 94: Admit that David Madore sent or received one
13 or more text messages to or from Anna Miller during his period in elected office as
14 County Commissioner/Councilor relating to County governance.

15 Deny to the extent that it is Mr. Madore's best recollection that there are no
16 text messages to or from the person indicated in this request. As with all
17 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

18 REQUEST FOR ADMISSION NO. 95: Admit that David Madore sent or received one
19 or more text messages to or from Margaret Tweet during his period in elected office as
20 County Commissioner/Councilor relating to County governance.

21 Deny to the extent that it is Mr. Madore's best recollection that there are no
22 text messages to or from the person indicated in this request. As with all
23 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

24 REQUEST FOR ADMISSION NO. 96: Admit that David Madore sent or received one
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1 or more text messages to or from Carol Levanen during his period in elected office as
2 County Commissioner/Councilor relating to County governance.

3 Deny to the extent that it is Mr. Madore's best recollection that there are no
4 text messages to or from the person indicated in this request. As with all
5 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

6 REQUEST FOR ADMISSION NO. 97: Admit that David Madore sent or received one
7 or more text messages to or from Susan Rasmussen during his period in elected office
8 as County Commissioner/Councilor relating to County governance.

9 Deny to the extent that it is Mr. Madore's best recollection that there are no
10 text messages to or from the person indicated in this request. As with all
11 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

12 REQUEST FOR ADMISSION NO. 98: Admit that David Madore sent or received one
13 or more text messages to or from Tiffany Couch during his period in elected office as
14 County Commissioner/Councilor relating to County governance.

15 Deny to the extent that it is Mr. Madore's best recollection that there are no
16 text messages to or from the person indicated in this request. As with all
17 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

18 REQUEST FOR ADMISSION NO. 99: Admit that David Madore sent or received one
19 or more text messages to or from Chuck Miller during his period in elected office as
20 County Commissioner/Councilor relating to County governance.

21 Deny to the extent that it is Mr. Madore's best recollection that there are no
22 text messages to or from the person indicated in this request. As with all
23 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

24 REQUEST FOR ADMISSION NO. 100: Admit that David Madore sent or received d
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1 one or more text messages to or from Peter Silliman during his period in elected office
2 as County Commissioner/Councilor relating to County governance.

3 Deny to the extent that it is Mr. Madore's best recollection that there are no
4 text messages to or from the person indicated in this request. As with all
5 requests, Mr. Madore is not in possession of many of the text messages sent
6 or received from his device and has sought the assistance of his phone
7 carrier to obtain messages which are no longer on his device.

8 REQUEST FOR ADMISSION NO. 101: Admit that David Madore sent or received one
9 or more text messages to or from Christian Berrigan during his period in elected office
10 as County Commissioner/Councilor relating to County governance.

11 Deny to the extent that it is Mr. Madore's best recollection that there are no
12 text messages to or from the person indicated in this request. As with all
13 requests, Mr. Madore is not in possession of many of the text messages sent
14 or received from his device and has sought the assistance of his phone
15 carrier to obtain messages which are no longer on his device.

16 REQUEST FOR ADMISSION NO. 102: Admit that David Madore sent or received one
17 or more text messages to or from Debbie Peterson during his period in elected office as
18 County Commissioner/Councilor relating to County governance.

19 Deny to the extent that it is Mr. Madore's best recollection that there are no
20 text messages to or from the person indicated in this request. As with all
21 requests, Mr. Madore is not in possession of many of the text messages sent
22 or received from his device and has sought the assistance of his phone
23 carrier to obtain messages which are no longer on his device.

24 REQUEST FOR ADMISSION NO. 103: Admit that David Madore sent or received one
25 or more text messages to or from John Ley during his period in elected office as County
Commissioner/Councilor relating to County governance.

Deny to the extent that it is Mr. Madore's best recollection that there are no
text messages to or from the person indicated in this request. As with all
requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

REQUEST FOR ADMISSION NO. 104: Admit that David Madore sent or received one

1 or more text messages to or from Liz Pike during his period in elected office as County
2 Commissioner/Councilor relating to County governance.

3 Deny to the extent that it is Mr. Madore's best recollection that there are no
4 text messages to or from the person indicated in this request. As with all
5 requests, Mr. Madore is not in possession of many of the text messages sent
6 or received from his device and has sought the assistance of his phone
7 carrier to obtain messages which are no longer on his device.

8 REQUEST FOR ADMISSION NO. 105: Admit that David Madore sent or received one
9 or more text messages to or from Tom Edwards during his period in elected office as
10 County Commissioner/Councilor relating to County governance.

11 Deny to the extent that it is Mr. Madore's best recollection that there are no
12 text messages to or from the person indicated in this request. As with all
13 requests, Mr. Madore is not in possession of many of the text messages sent
14 or received from his device and has sought the assistance of his phone
15 carrier to obtain messages which are no longer on his device.

16 REQUEST FOR ADMISSION NO. 106: Admit that David Madore sent or received one
17 or more text messages to or from Stephanie Rice during his period in elected office as
18 County Commissioner/Councilor relating to County governance.

19 Deny to the extent that it is Mr. Madore's best recollection that there are no
20 text messages to or from the person indicated in this request. As with all
21 requests, Mr. Madore is not in possession of many of the text messages sent
22 or received from his device and has sought the assistance of his phone
23 carrier to obtain messages which are no longer on his device.

24 REQUEST FOR ADMISSION NO. 107: Admit that David Madore sent or received one
25 or more text messages to or from Lynda Wilson during his period in elected office as
County Commissioner/Councilor relating to County governance.

Deny to the extent that it is Mr. Madore's best recollection that there are no
text messages to or from the person indicated in this request. As with all
requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

REQUEST FOR ADMISSION NO. 108: Admit that David Madore sent or received one

1 or more text messages to or from Tracy Wilson during his period in elected office as
2 County Commissioner/Councilor relating to County governance.

3 Deny to the extent that it is Mr. Madore's best recollection that there are no
4 text messages to or from the person indicated in this request. As with all
5 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

6 REQUEST FOR ADMISSION NO. 109: Admit that sent or received David Madore sent
7 or received one or more text messages to or from Mark Engleman during his period in
8 elected office as County Commissioner/Councilor relating to County governance.

9 Deny to the extent that it is Mr. Madore's best recollection that there are no
10 text messages to or from the person indicated in this request. As with all
11 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

12 REQUEST FOR ADMISSION NO. 110: Admit that David Madore sent or received one
13 or more text messages to or from Brent Boger_ during his period in elected office as
14 County Commissioner/Councilor relating to County governance.

15 Deny to the extent that it is Mr. Madore's best recollection that there are no
16 text messages to or from the person indicated in this request. As with all
17 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

18 REQUEST FOR ADMISSION NO. 111: Admit that David Madore sent or received one
19 or more text messages to or from Scott Webber during his period in elected office as
20 County Commissioner/Councilor relating to County governance.

21 Deny to the extent that it is Mr. Madore's best recollection that there are no
22 text messages to or from the person indicated in this request. As with all
23 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

24 REQUEST FOR ADMISSION NO. 112: Admit that David Madore sent or received one
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1 or more text messages to or from Ann Rivers during his period in elected office as
2 County Commissioner/Councilor relating to County governance.

3 Deny to the extent that it is Mr. Madore's best recollection that there are no
4 text messages to or from the person indicated in this request. As with all
5 requests, Mr. Madore is not in possession of many of the text messages sent
6 or received from his device and has sought the assistance of his phone
7 carrier to obtain messages which are no longer on his device.

8 REQUEST FOR ADMISSION NO. 113: Admit that David Madore sent or received one
9 or more text messages to or from Jim Mains during his period in elected office as
10 County Commissioner/Councilor relating to County governance.

11 Deny to the extent that it is Mr. Madore's best recollection that there are no
12 text messages to or from the person indicated in this request. As with all
13 requests, Mr. Madore is not in possession of many of the text messages sent
14 or received from his device and has sought the assistance of his phone
15 carrier to obtain messages which are no longer on his device.

16 REQUEST FOR ADMISSION NO. 114: Admit that David Madore sent or received one
17 or more text messages to or from Sean Emerson during his period in elected office as
18 County Commissioner/Councilor relating to County governance.

19 Deny to the extent that it is Mr. Madore's best recollection that there are no
20 text messages to or from the person indicated in this request. As with all
21 requests, Mr. Madore is not in possession of many of the text messages sent
22 or received from his device and has sought the assistance of his phone
23 carrier to obtain messages which are no longer on his device.

24 REQUEST FOR ADMISSION NO. 115: Admit that David Madore sent or received one
25 or more text messages to or from Jordan Thompson during his period in elected office
as County Commissioner/Councilor relating to County governance.

Deny to the extent that it is Mr. Madore's best recollection that there are no
text messages to or from the person indicated in this request. As with all
requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

REQUEST FOR ADMISSION NO. 116: Admit that David Madore sent or received one

1 or more text messages to or from Sharon Nasset during his period in elected office as
2 County Commissioner/Councilor relating to County governance.

3 Deny to the extent that it is Mr. Madore's best recollection that there are no
4 text messages to or from the person indicated in this request. As with all
5 requests, Mr. Madore is not in possession of many of the text messages sent
6 or received from his device and has sought the assistance of his phone
7 carrier to obtain messages which are no longer on his device.

8 REQUEST FOR ADMISSION NO. 117: Admit that David Madore sent or received d
9 one or more text messages to or from Kenny Smith during his period in elected office
10 as County Commissioner/Councilor relating to County governance.

11 Deny to the extent that it is Mr. Madore's best recollection that there are no
12 text messages to or from the person indicated in this request. As with all
13 requests, Mr. Madore is not in possession of many of the text messages sent
14 or received from his device and has sought the assistance of his phone
15 carrier to obtain messages which are no longer on his device.

16 REQUEST FOR ADMISSION NO. 118: Admit that David Madore sent or received one
17 or more text messages to or from Glenn Olson during his period in elected office as
18 County Commissioner/Councilor relating to County governance.

19 Deny to the extent that it is Mr. Madore's best recollection that there are no
20 text messages to or from the person indicated in this request. As with all
21 requests, Mr. Madore is not in possession of many of the text messages sent
22 or received from his device and has sought the assistance of his phone
23 carrier to obtain messages which are no longer on his device.

24 REQUEST FOR ADMISSION NO. 119: Admit that David Madore sent or received one
25 or more text messages to or from Bronson Potter during his period in elected office as
County Commissioner/Councilor relating to County governance.

Deny to the extent that it is Mr. Madore's best recollection that there are no
text messages to or from the person indicated in this request. As with all
requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

REQUEST FOR ADMISSION NO. 120: Admit that David Madore sent or received one

1 or more text messages to or from Jim Dickman during his period in elected office as
2 County Commissioner/Councilor relating to County governance.

3 Deny to the extent that it is Mr. Madore's best recollection that there are no
4 text messages to or from the person indicated in this request. As with all
5 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

6 REQUEST FOR ADMISSION NO. 121: Admit that David Madore sent or received one
7 or more text messages to or from Pete Capell during his period in elected office as
8 County Commissioner/Councilor relating to County governance.

9 Deny to the extent that it is Mr. Madore's best recollection that there are no
10 text messages to or from the person indicated in this request. As with all
11 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

12 REQUEST FOR ADMISSION NO. 122: Admit that David Madore sent or received one
13 or more text messages to or from John Wiesman during his period in elected office as
14 County Commissioner/Councilor relating to County governance.

15 Deny to the extent that it is Mr. Madore's best recollection that there are no
16 text messages to or from the person indicated in this request. As with all
17 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

18 REQUEST FOR ADMISSION NO. 123: Admit that David Madore sent or received one
19 or more text messages to or from Cheryl Bledsoe during his period in elected office as
20 County Commissioner/Councilor relating to County governance.

21 Deny to the extent that it is Mr. Madore's best recollection that there are no
22 text messages to or from the person indicated in this request. As with all
23 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

24 REQUEST FOR ADMISSION NO. 124: Admit that David Madore sent or received one
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1 or more text messages to or from Kelly Sills during his period in elected office as
2 County Commissioner/Councilor relating to County governance.

3 Deny to the extent that it is Mr. Madore's best recollection that there are no
4 text messages to or from the person indicated in this request. As with all
5 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

6 REQUEST FOR ADMISSION NO. 125: Admit that David Madore sent or received one
7 or more text messages to or from Axel Swanson during his period in elected office as
8 County Commissioner/Councilor relating to County governance.

9 Deny to the extent that it is Mr. Madore's best recollection that there are no
10 text messages to or from the person indicated in this request. As with all
11 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

12 REQUEST FOR ADMISSION NO. 126: Admit that David Madore sent or received one
13 or more text messages to or from John Payne during his period in elected office as
14 County Commissioner/Councilor relating to County governance.

15 Deny to the extent that it is Mr. Madore's best recollection that there are no
16 text messages to or from the person indicated in this request. As with all
17 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

18 REQUEST FOR ADMISSION NO. 127: Admit that David Madore sent or received one
19 or more text messages to or from Chuck Atkins during his period in elected office as
20 County Commissioner/Councilor relating to County governance.

21 Deny to the extent that it is Mr. Madore's best recollection that there are no
22 text messages to or from the person indicated in this request. As with all
23 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

24 REQUEST FOR ADMISSION NO. 128: Admit that Council David Madore exchanged
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1 one or more text messages to or from Mike Cooke during his period in elected office as
2 County Commissioner/Councilor relating to County governance.

3 Deny to the extent that it is Mr. Madore's best recollection that there are no
4 text messages to or from the person indicated in this request. As with all
5 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

6 REQUEST FOR ADMISSION NO. 129: Admit that David Madore sent or received one
7 or more text messages to or from Julie Parrish during his period in elected office as
8 County Commissioner/Councilor relating to County governance.

9 Deny to the extent that it is Mr. Madore's best recollection that there are no
10 text messages to or from the person indicated in this request. As with all
11 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

12 REQUEST FOR ADMISSION NO. 130: Admit that David Madore sent or received one
13 or more text messages to or from Lindsay Berschauer during his period in elected office
14 as County Commissioner/Councilor relating to County governance.

15 Deny to the extent that it is Mr. Madore's best recollection that there are no
16 text messages to or from the person indicated in this request. As with all
17 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

18 REQUEST FOR ADMISSION NO. 131: Admit that David Madore sent or received one
19 or more text messages to or from Carolyn Crain during his period in elected office as
20 County Commissioner/Councilor relating to County governance.

21 Deny to the extent that it is Mr. Madore's best recollection that there are no
22 text messages to or from the person indicated in this request. As with all
23 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

24 REQUEST FOR ADMISSION NO. 132: Admit that David Madore sent or received one
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1 or more text messages to or from Dick Sohn during his period in elected office as
2 County Commissioner/Councilor relating to County governance.

3 Deny to the extent that it is Mr. Madore's best recollection that there are no
4 text messages to or from the person indicated in this request. As with all
5 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

6 REQUEST FOR ADMISSION NO. 133: Admit that David Madore sent or received one
7 or more text messages to or from Mark Engleman during his period in elected office as
8 County Commissioner/Councilor relating to County governance.

9 Deny to the extent that it is Mr. Madore's best recollection that there are no
10 text messages to or from the person indicated in this request. As with all
11 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

12 REQUEST FOR ADMISSION NO. 134: Admit that David Madore sent or received one
13 or more text messages to or from Steve Nelson during his period in elected office as
14 County Commissioner/Councilor relating to County governance.

15 Deny to the extent that it is Mr. Madore's best recollection that there are no
16 text messages to or from the person indicated in this request. As with all
17 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

18 REQUEST FOR ADMISSION NO. 135: Admit that David Madore sent or received one
19 or more text messages to or from Bob Stevens during his period in elected office as
20 County Commissioner/Councilor relating to County governance.

21 Deny to the extent that it is Mr. Madore's best recollection that there are no
22 text messages to or from the person indicated in this request. As with all
23 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

24 REQUEST FOR ADMISSION NO. 136: Admit that I David Madore sent or received one
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1 or more text messages to or from Heath Henderson during his period in elected office
2 as County Commissioner/Councilor relating to County governance.

3 Deny to the extent that it is Mr. Madore's best recollection that there are no
4 text messages to or from the person indicated in this request. As with all
5 requests, Mr. Madore is not in possession of many of the text messages sent
6 or received from his device and has sought the assistance of his phone
7 carrier to obtain messages which are no longer on his device.

8 REQUEST FOR ADMISSION NO. 137: Admit that David Madore sent or received d
9 one or more text messages to or from Jerry Oliver during his period in elected office as
10 County Commissioner/Councilor relating to County governance.

11 Deny to the extent that it is Mr. Madore's best recollection that there are no
12 text messages to or from the person indicated in this request. As with all
13 requests, Mr. Madore is not in possession of many of the text messages sent
14 or received from his device and has sought the assistance of his phone
15 carrier to obtain messages which are no longer on his device.

16 REQUEST FOR ADMISSION NO. 138: Admit that David Madore sent or received one
17 or more text messages to or from Kevin Peterson during his period in elected office as
18 County Commissioner/Councilor relating to County governance.

19 Deny to the extent that it is Mr. Madore's best recollection that there are no
20 text messages to or from the person indicated in this request. As with all
21 requests, Mr. Madore is not in possession of many of the text messages sent
22 or received from his device and has sought the assistance of his phone
23 carrier to obtain messages which are no longer on his device.

24 REQUEST FOR ADMISSION NO. 139: Admit that David Madore sent or received one
25 or more text messages to or from Tom Meilke during his period in elected office as
County Commissioner/Councilor relating to County governance.

Deny to the extent that it is Mr. Madore's best recollection that there are no
text messages to or from the person indicated in this request. As with all
requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

REQUEST FOR ADMISSION NO. 140: Admit that David Madore sent or received one

1 or more text messages to or from Marc Boldt during his period in elected office as
2 County Commissioner/Councilor relating to County governance.

3 Deny to the extent that it is Mr. Madore's best recollection that there are no
4 text messages to or from the person indicated in this request. As with all
5 requests, Mr. Madore is not in possession of many of the text messages sent
6 or received from his device and has sought the assistance of his phone
7 carrier to obtain messages which are no longer on his device.

8 REQUEST FOR ADMISSION NO. 141: Admit that David Madore sent or received one
9 or more text messages to or from Jeanne Stewart during his period in elected office as
10 County Commissioner/Councilor relating to County governance.

11 Deny to the extent that it is Mr. Madore's best recollection that there are no
12 text messages to or from the person indicated in this request. As with all
13 requests, Mr. Madore is not in possession of many of the text messages sent
14 or received from his device and has sought the assistance of his phone
15 carrier to obtain messages which are no longer on his device.

16 REQUEST FOR ADMISSION NO. 142: Admit that David Madore sent or received one
17 or more text messages to or from Julie Olson during his period in elected office as
18 County Commissioner/Councilor relating to County governance.

19 Deny to the extent that it is Mr. Madore's best recollection that there are no
20 text messages to or from the person indicated in this request. As with all
21 requests, Mr. Madore is not in possession of many of the text messages sent
22 or received from his device and has sought the assistance of his phone
23 carrier to obtain messages which are no longer on his device.

24 REQUEST FOR ADMISSION NO. 143: Admit that David Madore sent or received one
25 or more text messages to or from Mark McCauley during his period in elected office as
County Commissioner/Councilor relating to County governance.

Deny to the extent that it is Mr. Madore's best recollection that there are no
text messages to or from the person indicated in this request. As with all
requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

REQUEST FOR ADMISSION NO. 144: Admit that David Madore sent or received one

1 or more text messages to or from Ken Vance during his period in elected office as
2 County Commissioner/Councilor relating to County governance.

3 Deny to the extent that it is Mr. Madore's best recollection that there are no
4 text messages to or from the person indicated in this request. As with all
5 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

6 REQUEST FOR ADMISSION NO. 145: Admit that David Madore sent or received one
7 or more text messages to or from Jim Karlock during his period in elected office as
8 County Commissioner/Councilor relating to County governance.

9 Deny to the extent that it is Mr. Madore's best recollection that there are no
10 text messages to or from the person indicated in this request. As with all
11 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

12 REQUEST FOR ADMISSION NO. 146: Admit that David Madore sent or received one
13 or more text messages to or from Bill Wright during his period in elected office as
14 County Commissioner/Councilor relating to County governance.

15 Deny to the extent that it is Mr. Madore's best recollection that there are no
16 text messages to or from the person indicated in this request. As with all
17 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

18 REQUEST FOR ADMISSION NO. 147: Admit that David Madore sent or received one
19 or more text messages to or from John Blom during his period in elected office as
20 County Commissioner/Councilor relating to County governance.

21 Deny to the extent that it is Mr. Madore's best recollection that there are no
22 text messages to or from the person indicated in this request. As with all
23 requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

24 REQUEST FOR ADMISSION NO. 148: Admit that David Madore sent or received one
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1 or more text messages to or from Steve Morasch during his period in elected office as
2 County Commissioner/Councilor relating to County governance.

3 Deny to the extent that it is Mr. Madore's best recollection that there are no
4 text messages to or from the person indicated in this request. As with all
5 requests, Mr. Madore is not in possession of many of the text messages sent
6 or received from his device and has sought the assistance of his phone
7 carrier to obtain messages which are no longer on his device.

8 REQUEST FOR ADMISSION NO. 149: Admit that David Madore sent or received one
9 or more text messages to or from Eilee Quiring during his period in elected office as
10 County Commissioner/Councilor relating to County governance.

11 Deny to the extent that it is Mr. Madore's best recollection that there are no
12 text messages to or from the person indicated in this request. As with all
13 requests, Mr. Madore is not in possession of many of the text messages sent
14 or received from his device and has sought the assistance of his phone
15 carrier to obtain messages which are no longer on his device.

16 REQUEST FOR ADMISSION NO. 150: Admit that David Madore sent or received one
17 or more text messages to or from Ronald Barca during his period in elected office as
18 County Commissioner/Councilor relating to County governance.

19 Deny to the extent that it is Mr. Madore's best recollection that there are no
20 text messages to or from the person indicated in this request. As with all
21 requests, Mr. Madore is not in possession of many of the text messages sent
22 or received from his device and has sought the assistance of his phone
23 carrier to obtain messages which are no longer on his device.

24 REQUEST FOR ADMISSION NO. 151: Admit that David Madore sent or received one
25 or more text messages to or from Karl Johnson during his period in elected office as
County Commissioner/Councilor relating to County governance.

Deny to the extent that it is Mr. Madore's best recollection that there are no
text messages to or from the person indicated in this request. As with all
requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

REQUEST FOR ADMISSION NO. 152: Admit that David Madore sent or received one

1 or more text messages to or from Richard Bender during his period in elected office as
2 County Commissioner/Councilor relating to County governance.

3 Deny to the extent that it is Mr. Madore's best recollection that there are no
4 text messages to or from the person indicated in this request. As with all
5 requests, Mr. Madore is not in possession of many of the text messages sent
6 or received from his device and has sought the assistance of his phone
7 carrier to obtain messages which are no longer on his device.

8 REQUEST FOR ADMISSION NO. 153: Admit that David Madore sent or received one
9 or more text messages to or from Oliver Orjiako during his period in elected office as
10 County Commissioner/Councilor relating to County governance.

11 Deny to the extent that it is Mr. Madore's best recollection that there are no
12 text messages to or from the person indicated in this request. As with all
13 requests, Mr. Madore is not in possession of many of the text messages sent
14 or received from his device and has sought the assistance of his phone
15 carrier to obtain messages which are no longer on his device.

16 REQUEST FOR ADMISSION NO. 154: Admit that David Madore sent or received one
17 or more text messages to or from Gordy Euler during his period in elected office as
18 County Commissioner/Councilor relating to County governance.

19 Deny to the extent that it is Mr. Madore's best recollection that there are no
20 text messages to or from the person indicated in this request. As with all
21 requests, Mr. Madore is not in possession of many of the text messages sent
22 or received from his device and has sought the assistance of his phone
23 carrier to obtain messages which are no longer on his device.

24 REQUEST FOR ADMISSION NO. 155: Admit that David Madore sent or received one
25 or more text messages to or from Larry Coursey during his period in elected office as
County Commissioner/Councilor relating to County governance.

Deny to the extent that it is Mr. Madore's best recollection that there are no
text messages to or from the person indicated in this request. As with all
requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

REQUEST FOR ADMISSION NO. 156: Admit that David Madore sent or received one

1 or more text messages to or from Nick Springer during his period in elected office as
2 County Commissioner/Councilor relating to County governance.

3 Deny to the extent that it is Mr. Madore's best recollection that there are no
4 text messages to or from the person indicated in this request. As with all
5 requests, Mr. Madore is not in possession of many of the text messages sent
6 or received from his device and has sought the assistance of his phone
7 carrier to obtain messages which are no longer on his device.

8 REQUEST FOR ADMISSION NO. 157: Admit that David Madore sent or received one
9 or more text messages to or from Steven Herman during his period in elected office as
10 County Commissioner/Councilor relating to County governance.

11 Deny to the extent that it is Mr. Madore's best recollection that there are no
12 text messages to or from the person indicated in this request. As with all
13 requests, Mr. Madore is not in possession of many of the text messages sent
14 or received from his device and has sought the assistance of his phone
15 carrier to obtain messages which are no longer on his device.

16 REQUEST FOR ADMISSION NO. 158: Admit that David Madore sent or received one
17 or more text messages to or from Dave Brown during his period in elected office as
18 County Commissioner/Councilor relating to County governance.

19 Deny to the extent that it is Mr. Madore's best recollection that there are no
20 text messages to or from the person indicated in this request. As with all
21 requests, Mr. Madore is not in possession of many of the text messages sent
22 or received from his device and has sought the assistance of his phone
23 carrier to obtain messages which are no longer on his device.

24 REQUEST FOR ADMISSION NO. 159: Admit that David Madore sent or received one
25 or more text messages to or from Sherrilyn Fisher during his period in elected office as
County Commissioner/Councilor relating to County governance.

Deny to the extent that it is Mr. Madore's best recollection that there are no
text messages to or from the person indicated in this request. As with all
requests, Mr. Madore is not in possession of many of the text messages sent
or received from his device and has sought the assistance of his phone
carrier to obtain messages which are no longer on his device.

REQUEST FOR ADMISSION NO. 160: Admit that David Madore sent or received one

1 or more text messages to or from Katie Gillespie during his period in elected office as
2 County Commissioner/Councilor relating to County governance.

3 Deny to the extent that it is Mr. Madore's best recollection that there are no
4 text messages to or from the person indicated in this request. As with all
5 requests, Mr. Madore is not in possession of many of the text messages sent
6 or received from his device and has sought the assistance of his phone
7 carrier to obtain messages which are no longer on his device.

8 REQUEST FOR ADMISSION NO. 161: Admit that David Madore participated in one or
9 more text messages exchanges during the calendar year 2013 *in addition to* an
10 exchange occurring on November 19, 2013 relating to County governance.

11 Admit.

12 RESPONSES dated this 30TH day of June, 2016



13 Bill Richardson, WSBA #42104
14 Attorney for Respondent Clark County
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CERTIFICATE OF MAILING

I, Nicole Davis, hereby certify that on the 30th day of June, 2016, I emailed and deposited a true and correct copy of the document affixed hereto in the mails of the U.S. Postal Service, postage prepaid to the following:

Greg Ferguson
Attorney at Law
112 W. 11th Street, Suite 100
Vancouver WA 98660
Greg@greg-ferguson.com



Nicole Davis

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