IN THE SUPERIOR COURT OF WASHINGTON

IN AND FOR THE COUNTY OF \*\*\*\*

|  |  |
| --- | --- |
| In re the Detention of \*Client\*,Respondent. | No. \*\*\*\*\*RESPONDENT’S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION TO PETITIONER  |

TO: \*State of Washington, Petitioner\*;

TO: \*\*\*\*\*, Attorneys for Petitioner

**PROCEDURES**

 The documents requested and inquired about herein are intended to include electronically stored documents and communications including but not limited to e-mail. You are hereby put on notice that any of the materials referenced herein may be subject to a request for production and the Petitioner shall not cause to be deleted, destroyed or modified any such document in any electronic media, including but not limited to: hard disk, floppy disk, CD-ROM, tape drive, laser disk in any media whatsoever as to cause its destruction or modification.

 Should you object to answering a particular or sub-part of an Interrogatory or responding to a Request for Production based on a claim of privilege, for each such claim of privilege or document or fact, please identify, if applicable, the length and format of document, the type of document, the date, time and place of generation, transmittal(s) and receipt(s), the date signed, general subject area, the relationship of the author to Petitioner, if any, the present custodian of each said document and other summary information pursuant to the civil rules on discovery to allow a judge to make rulings regarding any claimed privilege.

 **1. General**. In accordance with Civil Rules 26, 33 and 34, you have been served with these interrogatories and requests for production to which you must respond fully and separately, under oath, within thirty (30) days of the date of service upon you or your attorney. Your responses are to be signed by you and any objections are to be signed by your attorney of record, as required by Rule 26(g) and 33(a). The verified original of these interrogatories and requests for production, together with your responses thereto, must be returned to the undersigned attorney, at the \*My Office\* at the address listed below within the time limit set forth in this document.

 **2. Extra Pages**. In preparing these discovery requests, space has been provided for your response after each complete discovery request. If there is insufficient room for a full and complete response to any discovery request, please attach supplemental pages.

 **3. Supplementation**. These discovery requests are continuing in nature, and you are required to seasonably provide, upon receipt and without further request by Respondent, any and all subsequently obtained information and documentation which alters or augments, in any way, the responses now given.

 **4. Scope**. In responding to these discovery requests, you are required to furnish all information which is available to you, not merely the information of which you have present knowledge or which is now in your possession. You are under an affirmative obligation to actively search out and provide all information and documentation that is responsive to these discovery requests. This is intended to include, but is not limited to, all information in the possession or under the control of the petitioner, its agents, attorneys, investigators or representatives. If you do not know and cannot ascertain the answer to any discovery request, please so state in lieu of any other answer.

 **5. Objections**. If you object to providing a full and complete response to any part of a discovery request, you must respond to all portions to which you do not object, and set forth with particularity each objection to the balance of the discovery request, together with the factual and legal reasons supporting each objection. If your objection is based upon any claim of privilege, set forth the privilege claimed together with all facts upon which you rely to support your claim of privilege and describe with particularity the nature and extent of the privilege claimed, e.g., a privilege log should be supplied as contemplated by the civil rules of procedure.

 If you object to the production of any documents, you are required to state the date and the subject matter of the document, the identity (as that term is hereinafter defined) of the author and each recipient or intended recipient of the document.

**6. Identity of Persons**. Whenever you are asked for the identity of, or to identify a person, you must provide that person's full name, present residence address and day and evening telephone numbers.

 **7. Identity of Documents**. Whenever you are asked for the identity of, or to identify a document or documents, you must answer with sufficient specificity and particularity as would allow adequate identification of the item in a request for production under Rule 34 of the Civil Rules for Superior Court. Your answer must at least include the date, author, title, type of document, its present location, the identity (as the term has previously been defined) of its custodian, and a summary of the information and conclusions contained in it.

 As used in these requests for production, the term "document" or "documents" is to be interpreted as broadly as possible, so as to include every memorialization of any kind of information or data, by whatever method or means memorialized or recorded. It shall include but not necessarily be limited to, the original and any non-identical copy, regardless of origin or location, of every book, pamphlet, periodical, letter, memorandum, telegram, report, record, study, handwritten note, business record, diary, calendar, telephone record, chart, graph, drawing, diagram, photograph, working paper, index, tape, floppy disk, data sheet, data processing record, and any other written, recorded, transcribed, punched, taped, filmed, or graphically recorded material, however, produced or reproduced, to which you have access or have had access.

 In lieu of identifying any particular document, you may attach a full, complete, and legible copy to your responses to these requests for production with the above information and that requested in No. 8 below, referenced.

 **8. Document Production**. These requests for production of documents are made pursuant to CR 34. In addition to stating your response to each request in the space provided below it, you are required to produce the requested documents for inspection and copying at the office of \*My Office\*, \*My Office Address\*, at a time mutually agreeable, but in no event later than 8:30 a.m. on the first business day following the expiration of thirty (30) days from the date of service of these requests for production upon you. In providing the requested documents, you are required to identify with particularity which of the documents are being provided in response to each of the requests for production, where the documents were located, what attempts were made to locate documents, by whom, where and what date(s), and Bates stamp the materials in response and identify the materials by Bates stamped numbers, as well.

 **9. Authentication**. Respondent requests that an authorized agent of the Petitioner

authenticate these discovery requests, including but not limited to, identifying with particularity, which request for production number that person and each document responds to, to a degree sufficient to identify persons for further discovery, including, but not limited to: deposition or trial testimony. Respondent specifically asks that Petitioner’s agent (word omitted), including but not limited to investigators or in-house counsel, sign the authentication unless that same person or persons will make themselves available as a witness for further testimony and examination.

 **10. Terminology**. In reviewing these interrogatories and requests for production, you are asked to keep in mind, that for purposes of clarity and brevity, the single number includes the plural number and vice versa; the masculine gender includes the feminine and neuter genders; and the past tense includes the present tense and vice versa, where the clear meaning of a sentence is not distorted by the change of tense.

 **11. Headings**. Most of the paragraphs in this pleading have been given titles or headings for convenience in referring to them and to aid in locating information. These headings are not intended to limit or expand the scope of the interrogatory, request for production, or other paragraph; rather the meaning of each paragraph should be derived solely from the content of the paragraph itself and the foregoing portions of this document relating to procedures.

 **12. Definitions.**  As used herein, the term “Petitioner” or “You” means the State of Washington, the Department of Social and Health Services, and its managers, owners, supervisors, agents, employees and/or attorneys, including the Attorney General’s office and King County Prosecuting Attorney’s office.

 **13. Respondent**. As used herein, the term “respondent,” unless otherwise specified means the Respondent in the present case, \*Client\* .

**INTERROGATORIES**

**INTERROGATORY NO. 1:** **Preparation of Answers**

As to each interrogatory and request for production, indicate the name, address and title of each person who assisted in the preparation of its answer.

**ANSWER:**

**INTERROGATORY NO. 2: Predicate Conviction(s)**

 State all of the Respondent’s criminal convictions, adjudications or dispositions that you allege meet the definition of “sexually violent offense” within the meaning of RCW 71.09.020(15), and for all such convictions, adjudications or dispositions state with particularity:

a. Jurisdiction and the court entering the final judgment on the conviction, adjudication or disposition;

b. Date of conviction, adjudication or disposition;

c. Charge or charges for which Respondent was convicted, adjudicated or received

 a disposition;

d. Date of violation(s);

**ANSWER:**

**INTERROGATORY NO.** **3: Details of the Predicate Convictions**

Are you claiming that the details of the convictions identified above are relevant to the contested issues in this case and/or admissible at the trial in this case? If so, identify with particularity (see page 3 for the scope of the term “identify”)

a. all persons known to you or your attorney, who was or may have been a witness to the actual incidents that formed the basis of the above identified convictions, or who has any knowledge regarding the facts and circumstances surrounding the incidents;

b. all law enforcement agencies that participated in any manner in the investigation of the above referenced incidents;

c. all documents that were generated for the purpose of investigation and/or prosecution of the above referenced incidents and convictions;

d. all documents that pertain to or reference the above incidents or convictions.

**ANSWER:**

**INTERROGATORY NO .** **4: Mental Abnormality**

What mental abnormality or abnormalities do you allege that the Respondent currently has? For each such abnormality, state:

 a. the identity of all persons who made a medical, psychological or psychiatric diagnosis that Respondent currently has the above referenced abnormalities.

 b. the diagnostic criteria used by the above identified persons in reaching the diagnosis.

 c. all known symptoms of such mental abnormality.

 d. the specific instances of the above referenced symptoms that you allege Respondent exhibited.

 e. when you allege the above referenced symptoms were exhibited by Respondent;

 f. whether the diagnosis was reached for purposes of treatment or for litigation, or other purposes, if any;

 g. all documents that pertain to and/or reference the above-mentioned diagnosis.

**ANSWER:**

**INTERROGATORY NO. 5:** **Mental Abnormality (Treatment)**

Do you contend that the above identified abnormality or abnormalities are treatable? If so, state the nature, method and duration of such treatment and the authority for such contention:

**ANSWER:**

**INTERROGATORY NO.** **6:** **Personality Disorder**

What personality disorder or disorders do you allege that the Respondent currently has? For each such disorder, state:

 a. the identity of all persons who made a medical, psychological or psychiatric diagnosis that Respondent currently has the above referenced disorders;

 b. the diagnostic criteria used by the above identified persons in reaching the diagnosis;

 c. all known symptoms of such mental abnormality;

 d. the specific instances of the above referenced symptoms that you allege Respondent exhibited;

 e. the time period you allege the above referenced symptoms were exhibited by Respondent;

 f. whether the diagnosis was reached for the purposes of treatment or for litigation, or other purposes, if any;

 g. all documents that pertain to and/or reference the above mentioned diagnosis.

**ANSWER:**

**INTERROGATORY NO. 7:** **Personality Disorder (Treatment)**

Do you contend that the above identified personality disorder or disorders are treatable? If so, state the nature, method and duration of such treatment and the authority for that conclusion:

**ANSWER:**

**INTERROGATORY NO.** **8:** **Emotional or Volitional Capacity**.

Among the mental abnormalities and/or personality disorders identified above, which do you contend affects Respondent’s emotional or volitional capacity, and for all such abnormalities and disorders that Respondent allegedly has, state:

a. whether the abnormality or disorder is congenital or acquired;

b. whether or not you contend that the abnormality or disorder affects emotional or volitional capacity or both;

 c. whether you contend that the abnormality or disorder affects emotional or volitional capacity of all those who suffer from it;

 d. each and every fact that you contend supports the allegation that Respondent’s emotional or volitional capacity is affected by the above identified mental abnormality and/or personality disorder.

 e. the identity of all documents that you contend supports the allegation that Respondent’s emotional or volitional capacity is affected by the above identified mental abnormality and/or personality disorder.

**ANSWER:**

**INTERROGATORY NO.** **9:** **Predisposition**

 Do you contend that the mental abnormality and/or personality disorder identified in your answer to Interrogatory No. 8 predisposes Respondent to commit criminal sexual acts? If so, state:

 a. each and every fact that you contend supports the allegation that the above identified mental abnormality and/or personality disorder predisposes Respondent to commit criminal sexual acts;

 b. the nature of the sexual acts that you contend Respondent is predisposed to commit;

 c. the identity of all documents that you contend supports the allegation that the above identified mental abnormality and/or personality disorder predisposes Respondent to commit criminal sexual acts.

**ANSWER:**

**INTERROGAORY NO.** **10:** **Causation**

 Do you contend that the above identified mental abnormality and/or personality disorder currently causes Respondent serious difficulty in controlling sexually violent behavior? If so, state:

 a. each and every fact that you contend supports the allegation that the above identified mental abnormality and/or personality disorder currently causes Respondent serious difficulty in controlling sexually violent behavior;

 b. time, place and manner of what you contend was Respondent’s most recent sexually violent behavior;

 c. the identity of the documents that pertain to or reference the above alleged sexually violent behavior; and

 d. the identity of the documents that you contend supports your allegation that a mental abnormality or a personality disorder currently causes Respondent serious difficulty in controlling sexually violent behavior.

**ANSWER**:

**INTERROGATORY NO. 11:** **Likely to Engage**.

 Do you contend that as a result of the previously identified mental abnormality and/or personality disorder Respondent is likely to engage in predatory acts of sexual violence as the terms are used in RCW 71.09.020, if not confined to a secure facility? If so, state:

 a. the nature of such predatory acts of sexual violence;

 b. each and every fact that you contend supports the allegation that as a result of mental abnormality and/or personality disorder Respondent is likely to engage in predatory acts of sexual violence as the terms are used in RCW 71.09.020, if not confined to a secure facility;

**ANSWER:**

**INTERROGATORY NO.** **12:** **Actuarial Instrument**

Do you rely on any actuarial instruments in your contention that Respondent is currently likely to engage in predatory acts of sexual violence? If so, for each and every actuarial instrument relied upon, state:

a. the identity of the instrument;

b. the actuarial score, if any, assigned to the Respondent for the instrument;

c. all facts relied upon in arriving at the above actuarial score;

d. identity of all documents in your possession or control regarding the instrument.

**ANSWER:**

**INTERROGATORY NO.** **13: Recent Overt Act**

 Do you contend that Respondent committed one or more “recent overt acts” as defined under RCW 71.09.020(10)? If so, please state:

a. the time, place and nature of the act or acts that you contend constitute the above referenced “recent overt act”;

b. the time, place and nature of the threat or threats that you contend constitute the above referenced “recent overt act”;

c. the nature of the harm, if any, that you contend the above identified acts or threats caused;

d. the nature of the harm, if any, of which a reasonable apprehension was created in the mind of an objective person who knows of the history and mental condition of Respondent;

e. the identity of all persons who have personal knowledge of the alleged acts or threats identified above;

f. the identity of all persons who have other pertinent knowledge of the alleged acts or threats identified above; and

g. the identity of all documents that reference, summarize, memorialize, or pertain to the alleged acts or threats identified above.

**ANSWER:**

**INTERROGATORY NO.** **14:** **Statement of Respondent**

State whether there are any persons who are known to you who claim to have seen or heard the Respondent make any statements, which pertain to any of the happenings or events referred to in the your petition, or which are, in any way, material to the present case; and, if so, state:

a. the identity of such persons;

b. the identity of every person in whose presence the Respondent made each statement;

c. the date, time, place and circumstances under which the Respondent made each statement;

d. the precise content of each statement;

e. whether you or any person acting on your behalf has obtained statements, in any form, from any person who claims knowledge of each statement made by the Respondent; and, if so, state:

 1. the identity of each person providing the statement;

 2. the identity of the person taking each statement;

 3. the date, time and place each statement was taken; and

 4. identity the person having custody of each such statement.

**ANSWER:**

**INTERROGATORY NO.** **15:** **Prior Bad Acts**

 Do you contend that Respondent’s prior bad acts, prior arrests, or convictions, other than those that have been identified in the foregoing interrogatories, are relevant to any of the contested issues in this case? If so, state in particularity

 a. the date, place, and nature of the prior bad acts, prior arrests or convictions;

b. the identity of all persons known to you or your attorney, who was or may have been a witness to the above identified prior incidents, or who has any knowledge regarding the facts and circumstances surrounding the incidents;

c. the identity of all law enforcement agencies that participated in any manner in the investigation of the above referenced incidents, if any;

d. if the incident resulted in a criminal conviction, the identity of the court and the jurisdiction, the case number and the date of such conviction;

e. if the incident did not result in a criminal conviction, what was the resolution and by whom was it made:

f. all documents, if any, which were generated for the purpose of investigation and/or prosecution of the above referenced incidents and/or convictions;

g. all documents that pertain to or reference the above incidents or convictions

**ANSWER:**

**INTERROGATORY NO.** **16:** **Experts**

Pursuant to Civil Rule 26, please identify each person you expect to call as an expert at the time of trial. YOUR FAILURE TO FULLY AND TIMELY ANSWER THIS INTERROGATORY WILL RESULT IN RESPONDENT OBJECTING TO THE USE OF SUCH EXPERT AT TIME OF TRIAL. As to each expert, please state:

a. the expert's full name, job title, address and telephone number;

b. the name, address and telephone number of the expert’s employer, if any;

c. whether any written reports have been furnished by the expert to you and, if so, the dates thereof;

d. the subject matter on which the expert is expected to testify;

e. the substance of the facts and opinions to which the expert is expected to testify;

f. a summary of the grounds for each opinion to which the expert is expected to testify;

g. a statement of the expert's qualifications to testify in this action

h. the identity of all documents relied upon by the expert to reach his or her opinion in this case;

i. all cases in which the expert testified either in trial or in deposition, by identifying the name of the parties, the court and the jurisdiction, the dates of the testimony, and the party for whom the testimony was offered.

**ANSWER**:

**INTERROGATORY NO. 17**: **Expert Communication**

List each and every communication, whether by telephone, in person, or by writing, that the respondent has had with each and every expert identified in Interrogatory No.**16**. Please describe the nature of the communications with respondent conducted on the dates, including IDENTIFICATION of the individuals participating in each meeting, the duration of the meeting, and a brief description of the substance of each meeting.

**ANSWER**:

**INTERROGATORY NO.** **18**. **Impeachment and ER 609**

 For each of the State's witnesses or respondent's witnesses, IDENTIFY any DOCUMENTS or other information tending to call into question the witness's qualifications credibility, including any criminal arrests or convictions.

**ANSWER**:

**INTERROGATORY NO.** **19**: **DOCUMENTS TO NON-EXPERT**

Please IDENTIFY any DOCUMENTS you directed to or gave to any non-expert witness in this case, whether you plan to call that witness or not.

**ANSWER**:

**INTERROGATORY NO. 20:** **Other Witnesses**

State the full name, complete present or last known address, and phone number of every person known to you who has or may have any knowledge of the allegations made in your petition in this case, and who were not listed in your answer to the preceding interrogatories.

**ANSWER:**

**REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 1:** Please produce all documents identified in **Interrogatory No. 3: Details of the Predicate Conviction.** If these documents have previously been disclosed to Respondent, state the bates number or numbers of the documents responsive to this request.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 2:** Please produce all documents identified in **Interrogatory No. 4: Mental Abnormality.**  If these documents have previously been disclosed to Respondent, state the bates number or numbers of the documents responsive to this request.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 3:** Please produce all documents identified in **Interrogatory No. 6: Personality Disorder.**  If these documents have previously been disclosed to Respondent, state the Bates number or numbers of the documents responsive to this request.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 4:** Please produce all documents identified in **Interrogatory No. 8: Emotional or Volitional Capacity.**  If these documents have previously been disclosed to Respondent, state the Bates number or numbers of the documents responsive to this request.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 5:** Please produce all documents identified in **Interrogatory No. 9: Predisposition.**  If these documents have previously been disclosed to Respondent, state the Bates number or numbers of the documents responsive to this request.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 6:** Please produce all documents identified in **Interrogatory No. 10: Causation.**  If these documents have previously been disclosed to Respondent, state the Bates number or numbers of the documents responsive to this request.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 7:** Please produce all documents identified in **Interrogatory No. 12: Actuarial Instrument.**  If these documents have previously been disclosed to Respondent, state the Bates number or numbers of the documents responsive to this request.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 8:** Please produce all documents identified in **Interrogatory No. 13: Recent Overt Act.**  If these documents have previously been disclosed to Respondent, state the Bates number or numbers of the documents responsive to this request.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 9:** Please produce all statements identified in **Interrogatory No. 14: Statement of Respondent.**  If these documents containing the statement have previously been disclosed to Respondent, state the Bates number or numbers of the documents responsive to this request.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 10:** Please produce all documents identified in **Interrogatory No. 15: Prior Bad Acts.**  If these documents have previously been disclosed to Respondent, state the Bates number or numbers of the documents responsive to this request.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 11:** Please produce, for each expert, all documents identified in **Interrogatory No. 16: Experts** subpart h**.**  If these documents have previously been disclosed to Respondent, state the Bates number or numbers of the documents responsive to this request.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 12:** Please produce, for each expert, all reports identified in **Interrogatory No. 16: Experts** subpart c**.**  If these documents have previously been disclosed to Respondent, state the Bates number or numbers of the documents responsive to this request.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO.** **13:** Please produce, for each expert, all correspondence, emails and telephone call logs, and billings exchanged between you and the expert identified in **Interrogatory No. 16: Experts.**  If these documents have previously been disclosed to Respondent, state the Bates number or numbers of the documents responsive to this request.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 14:** Please produce, for each expert identified in **Interrogatory No. 16: Experts,** all transcripts of the expert’s testimony in your possession or control**.**  If these documents have previously been disclosed to Respondent, state the Bates number or numbers of the documents responsive to this request.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 15:** Please produce, for each expert identified in **Interrogatory No. 16: Experts,** all writings and recordings, as the terms are defined in ER 1001(a), exchanged between you and the expert regarding Respondent in your possession or control**.**  If these documents have previously been disclosed to Respondent, state the Bates number or numbers of the documents responsive to this request.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 16: To the extent not produced in response to the Request for Production No. 13,** please produce, for each expert identified in **Interrogatory No. 16: Experts,** all writings and recordings, as the terms are defined in ER 1001(a), exchanged between you and the expert regarding Respondent in your possession or control**.**  If these documents have previously been disclosed to Respondent, state the Bates number or numbers of the documents responsive to this request.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 17:** Please produce any DOCUMENTS identified in Interrogatory No.18.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 18**: Please PRODUCE all of the DOCUMENTS identified in Interrogatory No. 19.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 19: To the extent not produced in response to the foregoing Requests for Production,** please produce all non-privileged writings and recordings, as the terms are defined in ER 1001(a), pertaining to Respondent in your possession or control**.**  If these documents have previously been disclosed to Respondent, state the Bates number or numbers of the documents responsive to this request.

**RESPONSE:**

 DATED this \_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_, 2006.

 **The Defender Association**

 By \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Kenneth M. Chang, WSBA No. 26737

 Attorneys for Respondent

**CIVIL RULE 26(g) VERIFICATION**

 I, Jennifer G. Ritchie, Attorney for Petitioner, the State of Washington, have read the requests, responses and objections thereto and reviewed the documents and privilege logs produced and to the best of my knowledge, information, and belief formed after a reasonable inquiry it is 1) consistent with the civil rules and warranted by existing law or a good faith argument for the extension, modification, or reversal of existing law; 2) not interposed for any improper purpose, such as to harass or to cause unnecessary delay or needless in increase in the cost of litigation; and 3) not unreasonable or unduly burdensome or expensive, given the needs of the case, the discovery already had in the case, the amount in controversy, and the importance of the issues at stake in the litigation.

 DATED this \_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_, 2024.

 King County Prosecuting Attorney’s Office

 By: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 \*\*\*\*, WSBA No. \*\*\*\*

 Attorney for Petitioner

## VERIFICATION

|  |  |  |
| --- | --- | --- |
| STATE OF WASHINGTON | ) |  |
|  | ) | ss.  |
| COUNTY OF \_\_\_\_\_\_\_\_\_ | ) |  |

The undersigned, being first duly sworn on oath, deposes and says: That I am the duly authorized agent of the Petitioner herein, have read the foregoing Respondent’s First Interrogatories and Requests for Production to Petitioner and the answers thereto, know the contents thereof, and believe the same to be true.

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 SUBSCRIBED AND SWORN TO before me this \_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_, 2024.

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (print)

 NOTARY PUBLIC in and for the State

 of Washington residing at\_\_\_\_\_\_\_\_\_.

 My Commission Expires\_\_\_\_\_\_\_\_\_\_\_\_\_.

**CERTIFICATE OF SERVICE**

I, Kenneth M. Chang, certify under penalty of perjury under the laws of the State of Washington that I am the counsel for Respondent herein and that on 9/19/2024 I caused to be served on the person listed below in the manner shown.

***RESPONDENT’S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION TO PETITIONER***

\*\*\*\*

Assistant Attorney General

Counsel for Petitioner

Attorney General’s Office

800 Fifth Ave., Suite 2000

Seattle, WA 98104

(206) 464-6430

\*\*\*\*\*\*\*\*\*

Deputy Prosecuting Attorney

King County Prosecuting Attorney’s Office

Sexually Violent Predator Unit

500 Fourth Ave. #900

Seattle, WA 98104

Tel: 206-296-0430

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| [ ] United States Mail, First Class |   |
| [ ] By Legal Messenger |   |
| [ ] By Electronic Service Per LGR 30 |   |
| [ ] By Email Attachment |   |

 Dated this 19th day of September, 2024

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Kenneth M. Chang