



Katherine Wesch
4200 23rd Avenue West
Seattle, WA 98199

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E-Mail: katherine.wesch@tscan.biz

October 18, 2021

Snohomish School District
Attn: Kim Radek
1601 Avenue D
Snohomish, WA 98290

RE: [REDACTED] DOB: [REDACTED] SSN: xxx-xx-6779

Records Requested: Academic Records for the date range of 06/07/2007 to present

Dear Custodian of Records:

Enclosed with this letter is a Subpoena Duces Tecum from Schwabe Williamson & Wyatt, P.C. requesting copies of all records concerning the above-named individual. As stated in the subpoena, your office will be required to produce records by November 1, 2021.

When you mail or deliver the requested documents, please complete the enclosed Certification of Records, verifying that the documents provided are true and correct copies of all the documents requested. We will reimburse you for any reasonable copying costs you may incur. Please enclose your statement of copying costs with the documents. Also, please let T-Scan know at your earliest convenience of when you will be providing copies by mail or electronic means to:

T-Scan Corporation
4200 23rd Avenue West
Seattle, WA 98199
Fax: 800-238-7307 or Email: receiving@tscan.biz

Please contact T-Scan for approval prior to copying if the charges will exceed \$150.00. If available, T-Scan prefers delivery in an electronic format.

If you have any questions regarding the enclosed, please feel free to contact me at 206-285-6322. T-Scan will take responsibility for distributing any copies to other parties as this action may require. Thank you for your cooperation in this matter.

Very truly yours,

Katherine Wesch
Account Specialist

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5
6 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
7 FOR THE COUNTY OF KING

8 [REDACTED]
9 individually and as legal guardians of minor
10 [REDACTED], et al.,

11 Plaintiffs,

12 vs.

13 MONSANTO COMPANY, et al.,

14 Defendants.

No. [REDACTED]

SUBPOENA IN A CIVIL CASE

15 TO: Snohomish School District
16 Attn: Kim Radek
17 1601 Avenue D
18 Snohomish, WA 98290
19 360-563-7280

20 YOU ARE COMMANDED to produce and permit inspection and copying of the following
21 documents or tangible things at the place, date, and time specified below:

22 All records, charts, documents, and other information in your possession or under your
23 control pertinent to

24 [REDACTED]
25 SSN: xxx-xx-6779
26 DOB: [REDACTED]

including but not limited to, charts, teaching notes, test results, report cards, grade
transcripts, attendance records, school sports records, counseling records, disciplinary
records, commendations, special education records, medical records, and
correspondence, and all other records pertaining to this individual for the date
range of 06/07/2007 to present.

27 You may also comply with this subpoena by sending copies of the requested documents before
28 the date below to:

29 T-Scan Corporation
30 4200 23rd Avenue West, Suite 100
31 Seattle, WA 98199.

1 PLACE: Snohomish School District
2 1601 Avenue D
3 Snohomish, WA 98290
4 DATE AND TIME:
5 November 1, 2021
6 10:00 a.m.

7 ISSUING OFFICER:
8 s/ Stephanie Holmberg
9 Attorney Jennifer Campbell, WSBA #31703
10 Attorney Stephanie Holmberg, WSBA #58174
11 Attorneys for Defendant, Monsanto
12 DATE:
13 10/8/2021
14 ISSUING OFFICER'S NAME, ADDRESS AND PHONE:
15 Schwabe Williamson & Wyatt, P.C.
16 1420 Fifth Avenue, Suite 3400
17 Seattle, WA 98101-4010
18 Phone: (206) 622-1711

19 **P. PROOF OF SERVICE**

20 DATE SERVED:
21 October 18, 2021
22 PLACE:
23 Snohomish School District
24 Attn: Kim Radek
25 1601 Avenue D
26 Snohomish, WA 98290
27 SERVED ON (print name):
28 MANNER OF SERVICE:
29 US Mail
30 SERVED BY (print name):
31 TITLE:
32 Grace A. Selsor
33 Subp. Dept.

34 **DECLARATION OF SERVER**

35 I declare under penalty of perjury under the laws of the State of Washington that the foregoing
36 information contained in the Proof of Service is true and correct.

37 Executed on 10.18.2021
38 DATE/PLACE

39 [Signature]
40 SIGNATURE OF SERVER
41 4200 23rd Avenue West, Suite 100
42 Seattle, WA 98199
43 ADDRESS OF SERVER

CR 45, Sections (c) & (d):

(c) Protection of Persons Subject to Subpoenas.

- (1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense 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.
- (2) (A) A person commanded to produce and permit inspection and 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.
(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of 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 written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to 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.
- (3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it:
(i) fails to allow reasonable time for compliance;
(ii) fails to comply with RCW 5.66.010 or subsection (e)(2) of this rule;
(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies; or
(iv) subjects a person to undue burden; provided that the court may condition denial of this motion upon a requirement that the subpoenaing party advance the reasonable cost of producing the books, papers, documents, or tangible things.
(B) If a subpoena
(i) requires disclosure of a trade secret or other confidential research, development, or commercial information; or
(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the 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.

(d) Duties in Responding to Subpoena.

- (1) A person responding to a subpoena to produce documents shall 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.
- (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 made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.
(b) If information produced in response to a subpoena is subject to a claim of 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. After being notified, a party must promptly return, sequester, or destroy the specified 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 disclosed it before being notified; and may promptly present the information in 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.

ORDER NO: 19020380.24
KATHERINE WESCH
EMAIL: KATHERINE.WESCH@TSCAN.BIZ
PHONE: (206) 285-6322
FAX: (800) 238-7307



T-SCAN CORPORATION
4200 23RD AVENUE WEST
SEATTLE, WA 98149-1283



10/15/2021

CERTIFICATION

The Records Custodian For: **Snohomish School District**

Answer the Following Questions Regarding: **[REDACTED]**

Date of Birth: **[REDACTED]**

Social Security Number: **xxx-xx-6779**

1. Please state your name, name of business, address and telephone number:

2. Are you the authorized record custodian/librarian?

☐ YES ☐ NO: Explain: _____

3. Are the attached documents the complete Academic Records of the above-named facility regarding the above named person from **06/07/2007 to present**?

☐ YES, the following questions (3.1) MUST be completed:

3.1 How many pages of Academic Records are you providing T-Scan? _____

☐ NO. What documents have been omitted? _____

4. Were these records created, kept and maintained by the above-named entity in the regular course of business at or near the time of the act, condition or event recorded herein?

☐ YES ☐ NO: Explain: _____

5. If photocopies have been made of the original records, were copies made under your direction and control and are they true and correct copies?

☐ YES ☐ NO: Explain: _____

MARK BELOW IF NO RECORDS EXIST:

I certify that this facility **does not** have records pertaining to the above-named individual and/or time frame as requested, due to the following:

☐ No dates of service exist.

☐ The records have been destroyed in compliance under state laws.

☐ The records are maintained by the following facility: _____

☐ Other, Explain: _____

I hereby certify and declare under the penalty of perjury in accordance with the laws of the State of Washington, that the foregoing is true and correct.

X _____
Authorized Custodian or Representative Signature

Dated at _____, WA, this _____ of _____, 20____.

KATHERINE WESCH
EMAIL: KATHERINE.WESCH@TSCAN.BIZ

PHONE: (206) 285-6322
FAX: (800) 238-7307



RESELLER PERMIT

Washington State Department of Revenue
PO Box 47476 • Olympia, WA 98514-2476 • 1-800-647-7708

602 216 698
T-SCAN CORPORATION
4200 23RD AVE W
SEATTLE, WA 98199-1283

Permit Number: A08 5605 17

Effective Date: 01-01-2018
Expiration Date: 12-31-2021

Business Activities:
DOCUMENT PREPARATION SERVICES

This permit can be used to purchase:

- Merchandise and inventory for resale without intervening use
- Ingredients, components, or chemicals used in processing new articles of tangible personal property produced for sale
- Feed, seed, seedlings, fertilizer, and spray materials by a farmer
- Materials and contract labor for retail/wholesale construction
- Items for dual purposes (see Purchases for Dual Purposes on back)

This permit cannot be used to purchase:

- Items for personal or household use
- Promotional items or gifts
- Items used in your business that are not resold, such as office supplies, equipment, tools, and equipment rentals
- Materials and contract labor for public road construction or U.S. government contracting (see Definitions on back)
- Materials and contract labor for speculative building

This permit is no longer valid if the business is closed.

The business named on this permit acknowledges:

- It is solely responsible for all purchases made under this permit
- Misuse of the permit:
 - Subjects the business to a penalty of 50 percent of the tax due, in addition to the tax, interest, and penalties imposed (RCW 82.32.291)
 - May result in this permit being revoked

Notes (optional):

Important: The Department of Revenue may use information from sellers to verify all purchases made with this permit were qualified.

Reseller: Keep this original permit on file. Provide copies to sellers from which you make purchases.