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KING COUNTY
DEPARTMENT OF EXECUTIVE SERVICES
INQUEST PROGRAM

IN RE: INQUEST INTO THE DEATH OF
JASON SEEVERS,

Deceased.

Case No. 23-2-02285-5 SEA

Inquest No. 18IQ61954

SUBPOENA DUCES TECUM
AMENDED
(Clerk's Action Required)

TO:
MPD Public Documents Section
MPD Headquarters
300 Indiana Avenue, NW
Room 3075
Washington, DC 20001

Email: ogc.adminbox@dc.gov

You are hereby commanded to release to Inquest Program Attorney Anu Zangri the following materials:

All documents and police incident reports related to an officer-involved shooting by DC Metro Police Office Erick Schickler, on or between January 1, 1996 – December 31, 2000.

WHERE: Children & Family Justice Center, 1211 East Alder St., Sounders Conference Room, Seattle, WA 98122

WHEN: MARCH 13, 2023, 9am PST

SUBPOENA DUCES TECUM - 1



King County

Inquest Program

Department of Executive Services
401 Fifth Avenue, Suite 135
Seattle, WA 98104
206-477-6191
TTY Relay 711
Inquests@kingcounty.gov

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ALTERNATIVE MEANS OF SATISFYING THIS SUBPOENA: You may satisfy this subpoena by delivering requested items with a certificate of authenticity on or before March 3, 2023. Please email the documents to azangri@kingcounty.gov. US Postal Service is a satisfactory method of delivery as well. Please mail to 401 Fifth Avenue, Suite 135, Seattle, WA 98104.

FAILURE TO OBEY IS CONTEMPT OF COURT and can result in sanctions against you. The time and date is subject to change. The requirement to appear continues. Call (206) 477-8804 to verify the time and date of appearance.

DATED THIS 23 day of February, 2023



Judge Tanya L. Thorp

Presented by

/s/ Anu Zangri

Anu Zangri
WSBA #40481
Inquest Program Attorney

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 that party or attorney in breach of his 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

SUBPOENA DUCES TECUM - 2

 **King County**
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1
2 appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

3 (B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying
4 may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14
5 days; after service, serve upon the party or attorney designated in the subpoena written objection to inspection or
6 copying of any or all of the designated materials or of the premises. If objection is made, the party serving the
7 premises except pursuant to an order of the court by which the subpoena shall not be entitled to inspect and copy the
8 materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If
9 objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce and
10 all other parties, move at any time for an order to compel the production. Such an order to compel production shall
11 protect any person who is not a party or an officer of a party from significant expense resulting from the inspection
12 and copying commanded.

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

14 (i) fails to allow reasonable time for compliance;

15 (ii) fails to comply with RCW 5.56.010 or subsection (e)(2) of this rule;

16 (iii) requires disclosure of privileged or other protected matter and no exception or waiver applies; or

17 (iv) subjects a person to undue burden, provided that, the court may condition denial of the motion
18 upon a requirement that the subpoenaing party advance the reasonable cost of producing the books,
19 papers, documents, or tangible things.

20 (B) If a subpoena

21 (i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

22 (ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences
23 in dispute and resulting from the expert's study made not at the request of any party, the court may, to protect a
24 person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the
25 subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue
26 hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court
27 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) 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.