

1 PAUL N. McCLOSKEY, JR.  
2 BROBECK, PHLEGER & HARRISON  
3 Two Palo Alto Square #230  
4 Palo Alto, California 94306  
5 415/494-6100

6 Attorneys for Contestants

7  
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF SAN MATEO  
10

11  
12 GERTRUDE WILKS, et al., ) No. 275654  
13 Contestants, )  
14 vs. ) CONTESTANTS' RESPONSES TO  
15 BARBARA A. MOUTON, et al., ) INTERROGATORIES PROPOUNDED  
16 Defendants. ) BY DEFENDANT SAN MATEO COUNTY  
17

18 Responding Party: Contestants, Gertrude Wilks, et al.

19 Propounding Party: Defendant, San Mateo County

20 Set No. Two

21 Contestants respond herein to the Second Set of interroga-  
22 tories propounded to them by defendant County of San Mateo this  
23 morning. Objections to the interrogatories have been interposed by  
24 counsel for contestants.

25  
26 General Response to Each and Every Interrogatory:

27 1. Each interrogatory is construed so as not to call for  
28 information protected by the attorney-client, attorney work-product

1 or other privilege. To the extent the County of San Mateo construes  
2 any interrogatory otherwise, contestants object to each such  
3 interrogatory on grounds of the above privileges.

4 2. Contestants respond to the within interrogatories after  
5 reasonable search and investigation, particularly in light of the  
6 fact that the interrogatories were propounded this morning, without  
7 waiver of the right to modify, amplify or delete their responses in  
8 light of the fact that discovery is continuing.

9  
10 Interrogatory No. 1.

11 As to each and every vote on the amended list of illegal  
12 votes filed by contestants on July 29, 1983, state each and every  
13 ground upon which each vote is contested and the Elections Code  
14 provision, if any, which is alleged to have been violated.

15  
16 Response to Interrogatory No. 1.

17 Contests incorporate by reference the lists attached hereto  
18 which will be described herein. Please note that a voter may be on  
19 more than one list.

20 List "R" - residency violations under elections code §§  
21 17, 100, and 200-217.

22 List "H" - ballots hand delivered to the clerks office by  
23 a party other than the elector in violation of  
24 elections code §1013.

25 List "M" - absentee ballots mailed to a party other than the  
26 elector in violation of elections code §1007.

27 List "P" - privacy violations (ballots handled by a party,  
28 other than the elector) in violation of the

1 constitutional right to a secret ballot under  
2 Article II, §7 of the California Constitution.

3 List "W" - the wrong residence address is written on the  
4 absentee ballot envelope in violation of elections  
5 code §1009(c) and §1015.

6 List "I" - electors who are not citizens, in violation of  
7 elections code §17 and California Constitution,  
8 Article II, §2.  
9

10 DATED: August 1, 1983

Paul N. McCloskey, Jr.  
Brobeck, Phleger & Harrison

11  
12  
13 By: \_\_\_\_\_  
Paul N. McCloskey, Jr.  
Attorneys for Contestants  
14  
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406007	Adger, Royl 2187 Capitol Ave.	R	<i>okay</i>
406007	Ala, Marva 2195 Euclid	R	<i>dropped 8/12</i>
406002	Alberta, Vance 268 Westeria	R	<i>okay</i>
444004	Allen, Hugh W. 220 E. O'Keefe #9	R	<i>dropped 8/12</i>
444003	Anderson, Marion E. 445 E. O'Keefe #31	R	
406012	Augmon, Tommy 1944 University, #1 2024 Pulgas Ave.	R	<i>dropped 8/12</i>
444005	Barrett, Robin 30 Newell Rd., #16	R	<i>dropped 8/12</i>
406010	Beckum, Victor 2187 Illinois	R	<i>dropped 8/12</i>
444004	Bennett, Lowell J., Jr. 360 O'Keefe #15	R	
444004	Berry, Dina 340 E. O'Keefe #2	R	<i>dropped 8/12</i>
406006	Blue, Fred E. 1660 Bay Rd. #22	R	<i>dropped 8/12</i>
406006	Boyd, Virgil Isaac, Jr. 1100 Runnymede	R	
	Brown, Sheila R 1900 Clark Dr. #1202	R	<i>dropped 8/12</i>
406007	Carey, Robert L. 2345 Cooley #10	R	<i>dropped 8/12</i>
406011	Carlisle 1900 Clark Dr. #2104	R	<i>dropped 8/12</i>
406005	Chambers, Darryn G. 2722 Gonzaga	R	<i>dropped 8/12</i>

8/01/83

444003	Clemons, Stephanie 479 E. O'Keefe #2A	R	
406005	Commander, Irene 1779 Stevens Ave.	R	<i>dropped 8/12</i>
406006	Cox, Roosevelt, Jr. 1100 Runnymede	R	
444004	Craven, Richard F. 280 E. O'Keefe	R	<i>dropped 8/12</i>
406007	Curry, Shirlee A. 2263 University	R	<i>dropped 8/12</i>
406006	Dawan, Waheedah 1638 Bay Rd. #1	R	
406006	Dawson, Denise D. 2370 Cooley #33	R	
406011	Deal, Rae Jean 1900 Clark Dr. #124	R	
406005	Dixon, Elvis R., Jr. 2709 Fordham	R	<i>dropped 8/12</i>
444006	Drew, Judith 2001 Manhattan #119	R	
444003	Dupee, Lisa 479 E. O'Keefe #2A	R	<i>okay</i>
406011	Evans, Mrs. Bessie M 1900 Clark Dr. #1103	R	
406006	Evans, Willie Ray 2370 Cooley #7	R	<i>dropped 8/12</i>
406006	Fagin, Brenda 1660 Bay Rd. #36	R	<i>dropped 8/12</i>
406007	Fairchild, Joe Willie 2033 Cooley Ave. #1	R	<i>dropped 8/12</i>
406007	Fairchild, Joe Willie (Mrs.) 2033 Cooley Rd.	R	<i>dropped 8/12</i>
406007	Findley, Forrest Jr. 2035 Cooley #37	R	<i>dropped 8/12</i>

406005	Forbes, Gloria Y. 2840 Georgetown	R	<i>okay</i>
406005	Forbes, Violet 2840 Georgetown	R	<i>okay</i>
✓ 406001	Freeman, Mrs. Frankie 132 Abelia	R	<i>dropped 8/12</i>
406001	Freeman, Willie 132 Abelia Way	R	<i>dropped 8/12</i>
406003	Friauf, Ann 2282 Glen Way	R	
444004	Fulton, Raymond 450 E. O'Keefe #23	R	
444005	Gardner, Spurgeon 1950 Cooley #T8	R	
444003	Ghee, Shawn Patrick 479 O'Keefe #2A	R	<i>okay</i>
444003	Gibsen, Frenchia R. . 479 E. O'Keefe #2A	R	<i>okay</i>
406005	Graves, Deliva 2733 Illinois	R	<i>dropped 8/12</i>
406011	Gray, Dwendolyn (Miss) 1900 Clark Dr. #117	R	<i>dropped 8/12</i>
444003	Grissom, Arletha L. 2269 Cooley	R	<i>dropped 8/12</i>
	Harris, David 1640 Bay Rd.	R	<i>dropped 8/12</i>
406006	Havens, Alan L. 1640 Bay Rd. #15	R	<i>dropped 8/12</i>
406011	Henderson, Mrs. Louise 1900 Clark Drive	R	<i>dropped 8/12</i>
406012	Hill, Brian A 421 Daisy Lane	R	
406011	Holt, Miss Cheryl L. 1900 Clark Drive #2301	R	<i>dropped 8/12</i>

406012	Howard, James 419 Daisy Lane	R	<i>dropped 8/12</i>
406005	Hughes, Linda 2840 Illinois	R	<i>dropped 8/12</i>
406005	King, Mable 2772 Illinois	R	<i>dropped 8/12</i>
444006	Lara, Ricardo 2001 Manhattan #208	R	
444004	Laughead, Robert R. 2010 Euclid	R	<i>dropped 8/12</i>
406005	Lewis, Calvin 1900 Clark Drive #101	R	<i>dropped 8/12</i>
406008	Lomotey, Kofi 2503 Farrington Way	R	<i>dropped 8/12</i>
	Long, Robert 211 Turnhouse Lane	R	
444003	Marshall, Archie 395 E. O'Keefe #29	R	
406007	McCrewell, Katherine 2033 Cooley Ave. #24	R	
406003	McKenzie, Jacqueline 2240 Dumbarton Ave.	R	
406003	McKenzie, Ronnie 2240 Dumbarton Ave.	R	
444003	Middleton, Lois 479 E. O'Keefe #2A	R	<i>okay</i>
406002	Mitchell, Schery Ruth 252 Ayalia Dr.	R	<i>okay</i>
406011	Moore, James L. 1900 Clark Drive #1102	R	<i>dropped 8/12</i>
406011	Mouton, Lauriene A. 1900 Clark Dr. #2202	R	<i>dropped 8/12</i>
406007	Pace, Mattie B. 2035 Cooley #8	R	<i>okay</i>

444003	Parris, Gwendolyn 479 E. O'Keefe #2A	R	<i>okay</i>
406011	Pittman, Samuel L. 1900 Clark Drive #1301	R	<i>dropped 8/12</i>
406009	Ramsuer, Maurice 2331 Ralmar Ave.	R	<i>dropped 8/12</i>
406006	Reynolds, Faye E. 2370 Cooley #42	R	
406006	Robinson, Thomas L. 1640 Bay Rd. #17	R	<i>dropped 8/12</i>
406006	Robinson, Wanda 2370 Cooley #33	R	
444005	Romero, Carlos A. 15 Newell #5	R	<i>okay</i>
406011	Salinas, Mrs. Gloria 1900 Clark Drive #119	R	<i>dropped 8/12</i>
406006	Salmonson, Loren K. 1640 Bay Rd. #29	R	<i>dropped 8/12</i>
406012	Scales, Raymond 1265 Beech	R	<i>dropped 8/12</i>
444003	Scanlon, Mary 355 E. O'Keefe #14	R	<i>dropped 8/12</i>
406011	Scott, Rachell 1900 Clark Drive #108	R	<i>dropped 8/12</i>
444005	Simpson, Roderick 66 Newell Rd. H	R	<i>dropped 8/12</i>
406012	Slaughter, Sherry L. 355 Larkspur Dr.	R	<i>dropped 8/12</i>
406011	Smith, Dorothy 1900 Clark Drive #113	R	
406005	Smith, Irene 1779 Stevens Ave.	R	<i>dropped 8/12</i>
406007	Smith, Kaye .2171 Capitol	R	



406011	Smith, Margaret 1900 Clark Drive #118	R	
406011	Smith, Shawn S. 1900 Clark Drive #118	R	
406011	Sperling, Nolan 1900 Clark Drive #2107	R	<i>dropped 8/12</i>
444004	Steinmetz, Frank 450 E. O'Keefe #34	R	<i>dropped 8/12</i>
444003	Stowe, Kenneth 395 E. O'Keefe #12	R	
406006	Strong, Aron 2368 Clarke	R	
406006	Strong, Freddie D. 2368 Clarke	R	
406006	Taggart, Janet 1640 Bay Rd. #22	R	<i>dropped 8/12</i>
406005	Taylor, Johnnie L. 2800 Illinois	R	
406007	Taylor, Lessie 2035 Cooley #40	R	<i>dropped 8/12</i>
406010	Teba, Sharon 906 Bay Rd.	R	
406006	Timmons, Debbie 1660 Bay Rd. #20	R	<i>dropped 8/12</i>
406011	Tinsely, Willie M. 1900 Clark Drive #109	R	<i>dropped 8/12</i>
406005	Tyson, Kathryn 1657 Purdue	R	<i>dropped 8/12</i>
406007	Walker, Elizabeth 2035 Cooley #__	R	<i>dropped 8/12</i>
406005	Wallace, Karen R. 2784 Gonzaga	R	<i>dropped 8/12</i>
406006	Walton, Robert 1660 Bay Rd. #23	R	<i>dropped 8/12</i>

406006 Washington, Antoinette  
1660 Bay Rd. #33

406006 Washington, John  
1640 Bay Rd. #21

406005 Webb, Moses  
2714 Gonzaga St.

406006 Webster, William B.  
1640 Bay Rd. #30

406006 White, Matthew  
1794 Bay Road

406011 Williams, Kathy L.  
1900 Clark Drive #1209

406007 Willis, Bradford  
2274 Capitol Ave.

406007 Willis, John M.  
2274 Capitol Ave.

406012 Winters, Ken  
1265 Beech

406011 Wright, Gloria T.  
1900 Clark Drive #119

406011 Wright, Wilbert  
1900 Clark Drive #119

406007 Young, Eddie Jr.  
2039 Cooley #43

406007 Young, Vidella A.  
2039 Cooley #43

406005 Zachary, Daniel L.  
2663 Fordham

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R

406007	Ahern, Rosa Lee 2301 Cooley, Apt. 224	H
406011	Anderson, Sharon D. 2000 Cooley, Apt. 28	H
406002	Augmon, Ola Mae 219 Verbena	H
406007	Barrow, Consuelo 2301 Cooley #116	H
406007	Barrow, Maxine 2301 Cooley #114	H
406007	Bell, Willie Mae 2301 Cooley #320	H
406006	Boyd, Virgil Isaac, Jr. 1100 Runnymede	H
406007	Brandon, Ann 2301 Cooley #210	H
406007	Brandon, Betty 2301 Cooley #214	H
406007	Brookter, Luberta 2301 Cooley #118	H
406009	Brown, Mary A. 2383 Menalto	H
406009	Brown, Stanley C. 2383 Menalto Way	H
406003	Butler, Edward 2383 Oakwood Dr.	H
406010	Cody, Lanette 2150 Oakwood Dr.	H
406007	Cook, Christopher 2101 Euclid	H
406005	Crum, Brenda 1703 Tulane	H

406001	Dixon, Calvin 103 Verbena	H
406001	Dixon, Matielda 103 Verbena	H
444006	Fahey, Richard 1735 Woodland #25	H
406001	Gadlin, Geraldine 127 Jasmine Way	H
406005	Goodwill, Alnette 2871 Drew Ct.	H
406005	Goodwill, Debra 2861 Drew Ct.	H
406005	Goodwill, Don E. 2871 Drew Ct.	H
406005	Goodwill, Sherman J., Jr. 2871 Drew Ct.	H
406005	Goodwill, Thelma M. 2871 Drew Ct.	H
406006	Haynes, Renita 1640 Bay Rd. #26	H
406007	Heard, Bobbie 2301 Cooley #104	H
406007	Jefferson, Lila 2301 Cooley #316	H
406008	Julian, Alice 2576 Gloria Way	H
406008	Julian, Denise D. 2576 Gloria Way	H
406010	Julian, Louise 2175 Addison	H
406003	Julian, Vernon 2345 Dumbarton	H
406003	Julian, Vincent 2345 Dumbarton	H

406009	Knowles, Faye Dell 970 Newbridge St.	H
406009	Locksey, Warren 1104 Alberni	H
406009	Lyons, Eldridge 1104 Alberni	H
406009	Lyons, Mary 1104 Alberni	H
406007	McDaniel, James 2301 Cooley #103	H
406007	Minter, Joe 1493 E. Bayshore	H
444004	O'Sullivan, Wendy L. 2054 Euclid #3	H
406001	Owens, Mary L. 179 Jasmine Way	H
444006	Russell, Robert J. 1939 Capitol	H
406009	Shepard, Robbie Lee 111 Alberni St.	H
406007	Smith, Linda G. 2275 Euclid	H
406006	Strong, Aron 2368 Clarke	H
406006	Strong, Clara 2375 Clarke Apt. B	H
406008	Strong, Dwan A. 1512 Kavanaugh	H
406006	Strong, Freddie D. 2368 Clarke	H
406008	Strong, Kenneth Lee 1512 Kavanaugh	H
406008	Strong, Lucille D. 1512 Kavanaugh	H

406008	Strong, Sylvester .1512 Kavanaugh	H
406008	Thomas, Otelia 1596 Ursula Way	H
406007	Walton, Leona 2301 Cooley #121	H
406007	Washington, Priscilla 2301 Cooley #106	H
406001	White, Grant 179 Jasmine	H
406007	Wilson, Eleanor 2301 Cooley #124	H

406010	Ashford, Roy Lee 2227 Poplar	M
406002	Brown, Leona 1124 O'Connor	M
406012	Fontenot, Chester 2036 Pulgas	M
444003	Gilbert, Anitra C. 2119 Addison Apt. A	M
406010	Harmon, Michael 2150 Oakwood	M
406003	Julian, William R. 1416 Bay Rd.	M
406010	McGee, Lonnie 101 Garden St.	M
406007	Minter, Joe 1493 E. Bayshore	M
406010	Mitchell, Alberta 100 Garden St.	M
406003	Simon, Mildred M. 1416 Bay Rd.	M
406003	Simon, Rosalind M. 1416 Bay Rd.	M
406007	Smith, Earnest 474 Bell St.	M
406003	Smith, Ronnie 2265 Oakwood	M
406003	Smith, Sullen 2265 Oakwood	M
406006	Wallace, C. Raymond 710 Runnymede	M
406008	Whitefield, Melody M. 8 Gertrude Ct.	M

406001 Williams, Bennie  
115 Daphne Way

M



406010	Ashford, Roy Lee 2227 Poplar	W
406006	Black, Mamie L. 29 Buchanan Ct.	W
406002	Brown, Leona 1124 O'Connor	W
406012	Fontenot, Chester 2036 Pulgas	W
406005	Goodwill, Alnette 2871 Drew Ct.	W
406003	Julian, William R. 1416 Bay Rd.	W
406010	McGee, Lonnie 101 Garden St.	W
406010	Mitchell, Alberta 100 Garden St.	W
406003	Simon, Mildred M. 1416 Bay Rd.	W
406003	Simon, Rosalind M. 1416 Bay Rd.	W
406007	Smith, Bernice 474 Bell St.	W
406007	Smith, Earnest 474 Bell St.	W
406003	Smith, Ronnie 2265 Oakwood	W
406003	Smith, Sullen 2265 Oakwood	W
406008	Thomas, Otelia 1596 Ursula Way	W
406008	Whitefield, Melody M. 8 Gertrude Ct.	W

406001 Williams, Bennie  
115 Daphne Way

W

406022

Sanchez, Antonio  
111 Acatia Drive  
East Palo Alto, CA

I

FOLLOWING PAGES ARE "P" LIST

406012. Alvarez, Elvera  
2196 Pulgas

406012 Alvarez, Rogue  
2196 Pulgas

406006 Bowen, Norma F.  
769 Schembri Ln.

406002 Brown, Regina May  
223 Wisteria

406002 Carpenter, Bettie G.  
152 Azalia

406010 Correa, M. Mercedes  
2228 Ralmar

406005 Crum, Jon  
1703 Tulane

406005 Davis, Azer Lee  
2862 Illinois

406003 Dorkey, Virginia R.  
2397 Oakwood

406001 Duffy, Dora  
188 Wisteria

406012 Durr, Joe L.  
1174 O'Conner

406007 Durr, Joe L.  
421 Green

406007 Edgar, Clarice E.  
2205 Capitol

406002 Edwards, Genevieve  
272 Azalia

406012 Gaines, Debra  
464 Wisteria

406012 Gray, Georgia L.  
1230 Cypress

406012 Green, Cynthia  
419 Daisy Lane

406003 Guerrero, Estela A.  
2382 Palo Verde Ave.

406003 Haines, Catherine  
2338 Dumbarton

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406012	Harvey, Alice 1155 Sage St.	
406005	Harvey, Garr 2782 Gonzaga	<i>dropped 8/12</i>
406005	Harvey, Guy 2782 Gonzaga	
406005	Harvey, Helen 2782 Gonzaga	<i>dropped 8/12</i>
406005	Harvey, Robin 2782 Gonzaga	<i>dropped 8/12</i>
406005	Harvey, Rona 2782 Gonzaga	<i>dropped 8/12</i>
444006	Hennessey, Charles D. 1941 Cooley #12	<i>dropped 8/12</i>
406003	Hester, Susan 430 Oakdale	<i>dropped 8/12</i>
406012	Howard, Lillie 419 Daisy Lane	
406001	Jackson, Rochelle L. 1228 Camelia Dr.	<i>dropped 8/12</i>
406006	Jacobs, Joanna 1949 Cooley #2	<i>dropped 8/12</i>
406007	Johnson, Lillie Dunn 2190 Euclid	
406004	Keyes, Mae 2442 Fordham	
444004	Lacey, Gerard 2054 Euclid #3	<i>dropped 8/12</i>
406002	Larned, Estella B. 252 Verbena	
444006	Leadon, Kim I. 1928 Cooley #60	<i>dropped 8/12</i>
406007	Lopez, Margarita 2219 Capitol	<i>dropped 8/12</i>
406011	Lutcher, James E. 876 Schembri Ln.	
444006	Manning, James D. 1957 Cooley #48	<i>dropped 8/12</i>

406009 Martinez, Armando  
2371 Menalto

406003 McCallum, Katie  
2214 Dumbarton

444006 Merritt, Leslie L.  
1941 Cooley #8

444006 Merritt, Paddy Lee  
1941 Cooley #8

406008 Miller, Carolyn A.  
2520 Gloria Way

406008 Miller, Lillie Mae  
2520 Gloria Way

406010 Mitchell, La Tonia  
100 Garden St.

406005 Murphy, Columbus  
1681 Tulane Ave.

406009 Murray, Martha L.  
1184 Laurel Ave.

406002 Myers, Ruth  
259 Azalia Dr.

406008 Ortiz, Robin  
2576 Emmett Way

406006 Perez, Alfred  
1670 Bay Rd. #17

406006 Powell, Celia G.  
846 Runnymede

406006 Powell, Leila J.  
846 Runnymede

406007 Rambin, Tracie  
1437 E. Bayshore

406009 Ramsuer, Maurice C.  
2331 Ralmar

406005 Reed, Amanda Faye  
2839 Fordham

406005 Reed, Charlie Mae  
2839 Fordham

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444004	Reeves, Deborah A. 280 E. O'Keefe #E	<i>dropped 8/12</i>
406004	Richard, Dalfred 2486 Fordham	
406004	Richard, Donatila 2496 Fordham	
406008	Riley, Patricia 1595 Kavanaugh	
406007	Rios, Guadalupe 2016 Capitol	<i>dropped 8/12</i>
406010	Rodriguez, Antonio 2191 Dumbarton	<i>dropped 8/12</i>
444005	Rohman, Amelia 40 Newell Rd. #16	
406005	Ross, Frank 2852 Fordham	
406002	Sanchez, Antonio 111 Acalia Drive	
406003	Simon, Frances L. 1416 Bay Road	
406002	Smith, Willie Mae 256 Azalia	
406007	Spears, Davie Lee 2292 Capitol Ave.	<i>dropped 8/12</i>
406007	Strauss, Mary A. 2101 Euclid	
406002	Todd, Cheryl 1339 Camellia	
444003	Tompkinson, Catherine M. 315 E. O'Keefe #23	<i>dropped 8/12</i>
406003	Torrey, Anthony 2209 Dumbarton	<i>dropped 8/12</i>
406003	Torrey, Donna Monroe 2209 Dumbarton	<i>dropped 8/12</i>
444005	Trotter, Rhonda 45 Newell #203	



406002 Vance, Alberta  
268 Wisteria Dr.

406003 Villanueva, Max O.  
2236 Oakwood Dr.

406008 Weicek, Ronald P.  
1395 Bay

406007 White, Robert, Sr.  
2283 Euclid

406007 Williams, Nellie  
2190 Euclid Ave.

406003 Williams, Yvette Renee  
304 Lilac Ln.

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