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11 **IN THE UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF ARIZONA**

13 MARIA M. GONZALEZ, et al.,  
14  
15 Plaintiffs,  
16 v.  
17 STATE OF ARIZONA, et al.  
18 Defendants.

No. CV06-01268 PHX ROS  
No. CV06-1362 PCT JAT (Cons)  
No. CV06-1575 PHX EHC (Cons)

**DECLARATION OF COUNSEL  
IN SUPPORT OF MOTION  
FOR SUMMARY JUDGMENT  
DIRECTED TO THE GONZALEZ  
PLAINTIFFS BY DEFENDANTS  
STATE OF ARIZONA AND  
SECRETARY OF STATE**

(Assigned to the Honorable  
Roslyn O. Silver)

1 Barbara A. Bailey declares:

2 1. I am one of the attorneys of record in these consolidated cases and  
3 represent the State of Arizona and the Arizona Secretary of State (“Defendants”). I  
4 make this Declaration in support of Defendants’ Motion for Summary Judgment  
5 Directed to the Gonzalez Plaintiffs in Case No. CV 06-1268, which is filed herewith.

6 2. Attached at Tab 1 is a true and correct copy of excerpts of individual  
7 responses to Defendant’s Second Set of Interrogatories by plaintiffs Arizona Hispanic  
8 Community Forum, Association of Community Organizations for Reform Now,  
9 Chicanos Por La Causa, Common Cause, Friendly House, Project Vote, Southwest  
10 Voter Registration, and Valle Del Sol, which responses were served on Defendants in  
11 this matter.

12 3. Attached at Tab 2 is a true and correct copy of excerpts of individual  
13 supplemental responses to the Defendant’s Second Set of Interrogatories to plaintiffs  
14 Arizona Hispanic Community Forum, Association of Community Organizations for  
15 Reform Now, Chicanos Por La Causa, Common Cause, Friendly House, Project Vote,  
16 Southwest Voter Registration, and Valle Del Sol, which responses were served on  
17 Defendants in this matter.

18 4. Attached at Tab 3 is a true and correct copy of excerpts of “The Effect of  
19 Proposition 200 on Voter Registration in Arizona Third Supplemental Report of Louis  
20 Lanier, Ph.D.,” which was served on Defendants on April 25, 2008.

21 5. Attached at Tab 4 is a true and correct copy of excerpts of “The Effect of  
22 Proposition 200 on Voter Registration in Arizona”, by Louis Lanier, Ph.D., which was  
23 served on Defendants on January 4, 2008.

24 6. Attached at Tab 5 is a true and correct copy of excerpts of “Rebuttal of Dr.  
25 Jeffrey Zax,” by Rodolfo Espino, which was served on Defendants on March 7, 2008.

26 7. Attached at Tab 6 is a true and correct copy of Table 9e of the “Expert  
27 Report of Dr. Jorge Chapa,” which was served on Defendants on January 4, 2008.

28 8. Attached at Tab 7 is a true and correct copy of plaintiff Georgia Morrison-  
Flores’ responses to Defendants First Set of Interrogatories, which responses were

1 served on Defendants in this matter.

2 9. Attached at Tab 8 is a true and correct copy of excerpts of the September  
3 27, 2007, deposition of plaintiff Bernie Abeytia.

4 10. Attached at Tab 9 is a true and correct copy of excerpts of the individual  
5 responses to Defendant's First Set of Interrogatories by plaintiffs Arizona Hispanic  
6 Community Forum, Association of Community Organizations for Reform Now,  
7 Chicanos Por La Causa, Common Cause, Friendly House, Project Vote, Southwest  
8 Voter Registration, and Valle Del Sol, which responses were served on Defendants in  
9 this matter.

10 11. Attached at Tab 10 is a true and correct copy of plaintiffs Maria M.  
11 Gonzalez and Jesus M. Gonzalez responses to Defendants First Set of Interrogatories,  
12 which responses were served on Defendants in this matter.

13 12. Attached at Tab 11 is a true and correct copy of page 43 of the Arizona  
14 Secretary of State Election Procedures Manual (October 2007).

15 13. Attached at Tab 12 is a true and correct copy of excerpts of the August 11,  
16 2006, deposition of Ronald Anthony Sissons.

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I declare under penalty of perjury that the foregoing assertions of fact are true and correct.

Executed on June 6, 2008, at Phoenix, Arizona.

TERRY GODDARD  
Arizona Attorney General

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1 CERTIFICATE OF SERVICE

2 I hereby certify that on the 6th day of June, 2008, I caused the foregoing  
3 document to be electronically transmitted to the Clerk's Office using the CM/ECF  
4 System for filing and transmittal of a Notice of Electronic Filing to the following  
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6 COPY of the foregoing filed electronically  
7 this 6th day of June, 2008.

8 COPY sent this 6th day of June, 2008, via U.S. mail,  
9 with Notice of Electronic Filing to:

10 The Honorable Roslyn O. Silver  
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12 Sandra Day O'Connor U.S. Courthouse, Suite 624  
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15 \_\_\_\_\_  
16 /s Elizabeth A. Stark

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