

EXHIBIT

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IN THE UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

MARIA M. GONZALEZ, et al.,)	
)	No. CV06-1268-PHX-ROS
Plaintiffs,)	No. CV06-1362-PCT-ROS
)	No. CV06-1575-PHX-ROS
vs.)	
)	
STATE OF ARIZONA, et al.,)	
)	
Defendants.)	
)	

DEPOSITION OF DR. F. ARTURO ROSALES

Phoenix, Arizona
February 27, 2008
9:01 a.m.

REPORTED BY:
Debra Riggs Torres, RPR
Certified Reporter
Certificate No. 50647

PREPARED FOR:
The Court

(Original)

EXAMINATION

1
2 BY MS. PERALES:

3 Q. Dr. Rosales, I want to follow up on a couple of
4 exchanges that you had with Ms. Bailey, and I know that
5 sometimes it can be a little confusing about terms
6 like opinions or bases, so I want to clarify with you.

7 Do you plan to check your citation in
8 Footnote 34 of your report to David Berman's work, with
9 respect to Ms. Bailey's comment that she was unable to
10 find that passage on that page?

11 A. Very definitely.

12 Q. Okay. And do you plan, at this point, to check
13 the citation to the work of Laura Muñoz regarding the
14 school segregation persisting into the 1940s?

15 A. Yes.

16 Q. Okay. Do you plan, at this point, to check in
17 your report for where Footnote 80 might be or what the
18 information should be for Footnote 80?

19 A. I'll do my best. Seems to have disappeared. I
20 don't know what happened.

21 Q. But you plan to check for that?

22 A. Yes. For sure.

23 Q. You mentioned earlier in your deposition that you
24 had read something yesterday regarding the Flores
25 litigation. Do you plan to check into whatever it was

1 that you read yesterday and possibly update a little bit
2 on where that case is right now?

3 A. Yes.

4 Q. If you recall an additional citation for
5 something that's in a footnote right now, do you have any
6 plans to add that citation?

7 A. Yes. I'm going to add the senior thesis of one
8 of my students, who is not -- it's been so long. He went
9 to the University of Chicago, is now a professor at ASU.
10 His name is the David Ray Garcia. He wrote the very first
11 thesis on the Romo case.

12 Q. And you just remembered that recently, didn't
13 you?

14 A. Yes. I knew a lot about that case. I just knew
15 a lot, even before Laura did her dissertation.

16 Q. Are you also planning to check and see if you can
17 recall any additional sources for your information on
18 Operation Eagle Eye described in your report?

19 A. Yes. I know that there's a lot of information
20 out there, and I'm going to look into the -- more
21 information on the people who wrote those pieces.

22 Q. And are you also going to check and see if you
23 can find a specific end date for some of the voting laws
24 that you described, like the voter purge, or the literacy
25 test?

1 A. Yes.

2 Q. And I understand you described to Ms. Bailey that
3 you have -- you have been reading about and studying the
4 Mexican American experience in Arizona for some time now;
5 is that right?

6 A. That's correct.

7 Q. And some of the works that you cite in your
8 report, although you cannot remember the exact details
9 today, you are familiar with those works, you have read
10 them?

11 A. Yes. For sure, I -- I took information out from
12 the books and the dissertations and so forth, and I -- and
13 then of course once I put it in the report, I don't
14 remember the details, which you can't put all the details
15 in there.

16 Q. Okay. You spoke earlier with Ms. Bailey about
17 how aspects of the Mexican American experience in Arizona
18 have improved, such as the elimination of de juring,
19 school segregation, and the breakdown of residential
20 segregation.

21 Do you recall that testimony?

22 A. Yes, I do.

23 Q. And this is information that you've gained
24 through your work at the university as an academic; isn't
25 that right?

1 STATE OF ARIZONA)
) ss.
 2 COUNTY OF MARICOPA)

3 BE IT KNOWN that the foregoing
 4 deposition was taken before me, Debra Riggs Torres, a
 5 Certified Reporter in and for the County of Maricopa,
 6 State of Arizona; that the witness before testifying was
 7 duly sworn by me to testify to the whole truth; that the
 8 questions propounded to the witness and the answers of the
 9 witness thereto were taken down by me in shorthand and
 10 thereafter reduced to typewriting under my direction; that
 11 the deposition was submitted to the witness to read and
 12 sign; that the 211 pages contained herein are a true and
 13 correct transcript of all proceedings had upon the taking
 14 of said deposition, all done to the best of my skill and
 15 ability.

16 I FURTHER CERTIFY that I am in no way
 17 related to any of the parties hereto nor am I in any way
 18 interested in the outcome hereof.

19 DATED at Phoenix, Arizona, this 12th
 20 day of March, 2008.

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 22
 23
 24 Debra Riggs Torres
 Certified Reporter
 Certificate No. 50647
 25