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14 Attorneys for Gonzalez Plaintiffs

16 IN THE UNITED STATES DISTRICT COURT
17 FOR THE DISTRICT OF ARIZONA

18	Maria M. Gonzalez, et al.,)	No. CV-06-1268-PHX-ROS(Lead)
19)	No. CV-06-1362-PCT-ROS
20	Plaintiffs,)	No. CV-06-1575-PCT-ROS
21)	
22	vs.)	NOTICE OF THIRD PARTY
23)	DEPOSITION OF U.S.
24	State of Arizona, et al,)	CITIZENSHIP AND
25)	IMMIGRATION SERVICES
26	Defendants.)	PURSUANT TO F.R.C.P. 30(b)(6)
27)	BY PLAINTIFFS GONZALEZ, ET
28)	AL.
)	
)	(Assigned to the Honorable Roslyn O.
)	Silver)
)	

1 TO: U.S. Citizenship and Immigration Services, through its counsel Peter
2 Gregory, Office of the Chief Counsel, USCIS, U.S. Department of
3 Homeland Security, 20 Massachusetts Ave., Washington, DC 20529.

4 Plaintiffs give notice that they will take the deposition pursuant to FED. R. CIV. P.
5 30(b)(6) of the U.S. Citizenship and Immigration Services. The Citizenship and
6 Immigration Services has a duty pursuant to Rule 30(b)(6) to designate one or more
7 employees of the U.S. Citizenship and Immigration Services. The U.S. Citizenship and
8 Immigration Services has a duty pursuant to Rule 30(b)(6) to designate one or more
9 employees of the U.S. Citizenship and Immigration Services, or other persons who
10 consent to testify on its, and such person(s) shall testify as to the matters known or
11 reasonably available to the U.S. Citizenship and Immigration Services, on the topics
12 specified in the attached Schedule A.
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15 The deposition shall take place at 607 Fourteenth Street, N.W., Washington, DC
16 20005-2003, (202) 628-6600 on April 22, 2008 at 9:00 a.m. and will continue from day
17 to day until complete.

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19 Requests for reasonable accommodations for persons with disabilities must be
20 made at least three judicial days in advance of the deposition.

21
22 DATED: April 15, 2008

Respectfully submitted,

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25 By: s/Nina Perales
Nina Perales

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27 Counsel for Plaintiffs
Maria M. Gonzalez, et al.
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CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of April, 2008, I caused the foregoing document to be electronically transmitted to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to CM/ECF registrants.

s/Nina Perales
Nina Perales

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SCHEDULE A

Pursuant to Fed. R. Civ. P. 30(b)(6), Plaintiffs Maria Gonzalez, et al. set forth below the following subject matter areas for the deposition of the United States

Citizenship and Immigration Services (CIS):

1. U.S. CIS implementation and administration of the Systematic Alien Verification for Entitlements (SAVE) Program, including but not limited to (a) the purposes of and legal authority for the Program; (b) the agencies and individuals authorized to access and obtain information from the Program and the legal bases for their authorization; (c) the nature of the immigration-related information maintained by the Program, including but not limited to immigration status and naturalization information; (d) the procedures employed by authorized users to access and obtain information about individuals from the Program; (e) the procedures employed to update individual records maintained by the Program, including but not limited to whether updates are made by personnel in USCIS District or Field Offices; and (f) the length of time involved in updating SAVE records to reflect an individual's change in status from legal permanent resident to naturalized citizen, including but not limited to the geographic area served by the Phoenix, AZ and the Tucson, AZ USCIS Field Offices.
2. U.S. CIS implementation and administration of the Verification Information System (VIS) database, including but not limited to (a) the purposes of and legal authority for the database; (b) the agencies and individuals authorized to access and obtain information from the database and the legal bases for their

1 authorization; (c) the nature of the immigration-related information maintained
2 by the database, including but not limited to immigration status and
3 naturalization information; (d) the procedures employed by authorized users to
4 access and obtain information about individuals from the database; (e) the
5 procedures employed to update individual records maintained by the database,
6 including but not limited to whether updates are made by personnel in USCIS
7 District or Field Offices; and (f) the length of time involved in updating VIS
8 records to reflect an individual's change in status from legal permanent resident
9 to naturalized citizen, including but not limited to the geographic area served by
10 the Phoenix, AZ and the Tucson, AZ USCIS Field Offices.

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- 14 3. Authorized use of the SAVE Program and VIS database by County Recorder
15 offices in Arizona, including but not limited to (a) the list of authorized users, (b)
16 the dates on which the authorized users became authorized, and (c) the frequency
17 and manner in which County Recorder offices in Arizona access and obtain
18 information in the SAVE Program and VIS database.
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- 20 4. USCIS procedures for the maintenance of A-files, including but not limited to
21 describing the categories of persons to whom information from A-files may be
22 released and the legal bases for the release of an immigrant's information from
23 his or her A-file to individuals or public agencies.
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- 25 5. The definition, purpose and use of the Alien Registration Number within USCIS
26 and by individuals and public agencies outside of USCIS.
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- 1 6. The definition, purpose and use of the certificate of citizenship within USCIS
2 and by individuals and public agencies outside of USCIS, including but not
3 limited to a description of how and by whom certificates of citizenship are
4 generated, rules guiding the duplication of the certificate of citizenship, and the
5 significance of the numbers printed on the certificate of citizenship.
6
- 7 7. The definition, purpose and use of the certificate of naturalization within USCIS
8 and by individuals and public agencies outside of USCIS, including but not
9 limited to a description of how and by whom certificates of naturalization are
10 generated, rules guiding the duplication of the certificate of naturalization, the
11 location of the number of the certificate of naturalization on the certificate of
12 naturalization and the significance of the numbers printed on the certificate of
13 naturalization and the significance of the numbers printed on the certificate of
14 naturalization.
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- 16 8. The cost and length of time required to request and obtain a replacement
17 certificate of naturalization, including but not limited to the length of time
18 required in the geographic area served by the Phoenix, AZ and the Tucson, AZ
19 USCIS Field Offices.
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- 21 9. The Alien File (A-file) of Maria Magdalena Gonzalez, of Yuma, AZ (dob
22 4/13/1953).
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- 24 10. The SAVE and VIS records concerning Maria Magdalena Gonzalez, of Yuma,
25 AZ (dob 4/13/1953) including but not limited to the length of time that elapsed
26 between the date of naturalization and the dates on which Mrs. Gonzalez's
27 SAVE and VIS records were updated to reflect her naturalization.
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11. The Alien File (A-file) of Jesus Maria Gonzalez, of Yuma, AZ (dob 11/8/1949).

12. The SAVE and VIS records concerning Jesus Maria Gonzalez, of Yuma, AZ (dob 11/8/1949) including but not limited to the length of time that elapsed between the date of naturalization and the dates on which Mr. Gonzalez's SAVE and VIS records were updated to reflect his naturalization.