

EXHIBIT 13

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15 Attorneys for Gonzalez Plaintiffs

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

19 Maria M. Gonzalez, et al.,) No. CV-06-1268-PHX-ROS(Lead)
20) No. CV-06-1362-PCT-ROS
Plaintiffs,) No. CV-06-1575-PCT-ROS

21 vs.)

22) **GONZALEZ PLAINTIFFS'**
23 State of Arizona, et al,) **FIRST SET OF**
24 Defendants.) **INTERROGATORIES TO**
25) **DEFENDANTS HIGHTOWER**
26) **MARLER AND MADRILL**

27)
28) (Assigned to the
Honorable Roslyn O. Silver)

1 To: Susan Hightower Marler, Yuma County Recorder
2 Patti Madrill, Yuma County Elections Director
3 c/o M. Colleen Connor, MCAO Division of County Counsel, 222 N.
4 Central Avenue, Suite 1100, Phoenix, AZ 85004-2206

5 Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiffs
6 request that, within thirty (30) days of service, the above-named Defendant - in
7 accordance with the Definitions set forth below in Part I and the Instructions set forth
8 below in Part II - serve a written response and produce and permit inspection,
9 sampling, testing, photographing, and/or copying the items set forth below in Part III.
10 Further, the above-named Defendant is directed reasonably to supplement these
11 responses and production as provided by the same Rules. Unless counsel for the parties
12 makes another agreement, documents are to be produced at the offices of the Mexican
13 American Legal Defense and Educational Fund, Inc., 110 Broadway, Suite 300, San
14 Antonio, Texas 78205.
15

16 I. DEFINITIONS

17 For purposes of these interrogatories, the terms used herein shall have the following
18 meanings:
19

20 A. As used herein, the words “and” and “or” shall be construed either
21 conjunctively or disjunctively as required by the context to bring within the scope of
22 these requests any document that might be deemed outside its scope by another
23 construction.
24

25 B. “Communication” shall mean and include every manner or means of
26 disclosure, transfer, or exchange, and every disclosure, transfer, or exchange of
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28

1 information, whether orally or by document or whether face-to-face, by telephone, mail,
2 e-mail, personal delivery, or otherwise.

3 C. "Defendant" or "the State" shall refer to Defendant, State of Arizona, and
4 any other persons acting or purporting to act on its behalf.

6 D. "Complaint" shall refer to the lawsuit filed, Gonzalez v. State of Arizona, et.
7 al., Cause no. CV06-01268-PHX-ROS.

8 E. The term "arising out of or relating to" shall have its usual meaning and shall
9 also specifically mean reflecting, concerning, referring to, describing, representing,
10 evidencing or constituting.

12 F. "Describe" means to "identify" (as used in paragraphs H. and I. below) each
13 individual involved, to "identify" (as used in paragraph J. below) each act, event,
14 occurrence, or communication queried, and to "identify" (as used in paragraphs K., L.,
15 M. and N. below) all documents or other tangible things involved in the act, event, or
16 occurrence queried.

18 G. "Document" and "documents" are defined to be synonymous in meaning and
19 equal in scope to the usage of the terms in Federal Rule of Civil Procedure 34(a), in its
20 broadest sense, and shall mean and include all written, printed, typed, recorded or
21 graphic matter of every kind and description, both originals and copies, and all
22 attachments and appendices thereto, that are in the possession, custody or control of
23 Defendant or in the possession, custody or control of the attorney for Defendant. A
24 draft of a non-identical copy is a separate document within the meaning of this term.
25 Without limiting the term "control," a document is deemed to be within your control if
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27
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1 you have ownership, possession or custody of the document, or the right to secure the
2 document or copy thereof from any persons or public or private entity having physical
3 control thereof.
4

5 H. To “identify” an individual means to state that individual’s:

- 6 (i) full name;
- 7 (ii) current or last known telephone numbers at business and home; and
- 8 (iii) current or last known business and home addresses.

9 I. To “identify” a person (as defined herein) means to give, to the extent known,
10 the person’s full name, present or last know address, and when referring to a natural
11 person, additionally, the present or last known place of employment. Once a person has
12 been identified in accordance with this subparagraph, only the name of that person need
13 be listed in response to subsequent discovery requesting the identification of that
14 person.
15

16 J. To “identify” an act, event, occurrence or communication means:

- 17 (i) to state its date;
- 18 (ii) to identify the persons that were parties to and witnesses of the act, event, or
19 occurrence, or communication;
- 20 (iii) to describe where and how it took place; and
- 21 (iv) to identify any document that constitutes or refers to such act, event,
22 occurrence, or communication.

23 K. To “identify” a file means:

- 24 (i) to state the title contained thereon; and
- 25 (ii) to identify the person for whom the file is maintained.

26 L. To “identify” a statement means:

- 27 (i) to identify who make it;
- 28 (ii) to identify who took or recorded it;
- (iii) to identify all persons, if any, present during the making thereof;
- (iv) to state when, where and how it was taken or recorded; and

1 (v) to identify who has current or last know possession, custody or control
2 thereof.

3 M. To “identify: a document means:

4 (i) to identify all files in which it and all copies of it are found;

5 (ii) to identify its author;

6 (iii) to identify its addresses, if any;

7 (iv) to identify those who received a copy thereof;

8 (v) to identify its current custodian or the person that had last know possession,
9 custody or control thereof;

10 (vi) to state the date of its preparation; and

11 (vii) to state its general subject matter giving a reasonably detailed description
12 thereof.

13 N. To “identify any other tangible thing means:

14 (i) to identify what it is, giving a reasonably detailed description thereof;

15 (ii) to state when, where and how it was made, if applicable;

16 (iii) to identify who made it, if applicable; and

17 (iv) to identify its current custodian or the person that had known possession,
18 custody or control thereof.

19 O. “Statement” means and includes any written or graphic statement signed or
20 otherwise adopted or approved by the users in making it, any stenographic, mechanical,
21 electrical or other recording or a written transcription which is a substantially verbatim
22 recital or an oral statement made by a person which is contemporaneously recorded.

23 P. The plural of any word used herein includes the singular, and the singular
24 includes the plural.

25 Q. The masculine gender of any word used herein includes the feminine and the
26 neutral genders.

27 R. The past tense of any verb used herein includes the present tense, and the
28 present tense includes the past tense.

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II. INSTRUCTIONS

A. All interrogatories must be answered fully in writing in accordance with Rules 33 and 11 of the Federal Rules of Civil Procedure.

B. Each interrogatory must be answered separately for each Defendant.

C. Each interrogatory shall be set forth immediately prior to the answer thereto.

D. You and your attorney are under a duty to supplement your answers to these interrogatories by amending your answers if you or your attorney obtains information upon the basis of which:

(i) you or your attorney knows that the answer was incorrect or incomplete when made; or

(ii) you or your attorney knows that the answer, though correct and complete when made is no longer true and complete and the circumstances are such that failure to amend the answer is in substance misleading.

WARNINGS

A. A failure to answer these interrogatories on time or in good faith may result in sanctions being imposed against you under Rule 37 of the Federal Rules of Civil Procedure.

B. An evasive or incomplete answer is to be treated as a failure to answer.

C. You are required to state the truth, the whole truth, and nothing but the truth in answering these interrogatories.

III. INTERROGATORIES

1. Identify all facts related to fraud involving military personnel registering to vote using the federal post card application.

ANSWER:

1 2. Identify all facts showing fraud in the submission of federal voter
2 registration forms.

3 **ANSWER:**
4

5 3. State the number of persons who registered to vote, by month, but whom
6 were not required to show proof of citizenship under Proposition 200 because they were
7 already registered in the county.
8

9 **ANSWER:**
10

11 4. State the number of persons who registered to vote, by month, but whom
12 were required to show proof of citizenship under Proposition 200 because they were not
13 already registered in the county.
14

15 **ANSWER:**
16

17 5. Identify each and every fact related to the presence or absence of a history
18 of official discrimination that touches the right of any Latino to register, to vote, or
19 otherwise to participate in the democratic process.
20

21 **ANSWER:**
22

23 6. Identify each and every fact related to the presence or absence of racially
24 polarized voting in the county.
25

26 **ANSWER:**
27
28

1 7. Identify each and every fact related to the presence or absence of
2 unusually large election districts, majority vote requirements, anti-single shot
3 provisions, or other voting practices or procedures that may enhance the opportunity for
4 discrimination against Latinos.
5

6 **ANSWER:**
7
8

9 8. Identify each and every fact related to the presence or absence of a
10 candidate slating process in the county, or any political subdivision thereof, and that
11 Latinos have been denied access to the process.

12 **ANSWER:**
13
14

15 9. Identify each and every fact related to the presence or absence of
16 discrimination against Latinos in such areas as education, employment and health,
17 which hinder their ability to participate effectively in the political process.
18

19 **ANSWER:**
20
21

22 10. Identify each and every fact related to the presence or absence of overt
23 racial appeals with regard to Latinos in political campaigns in the county, or any
24 political subdivision thereof.
25

26 **ANSWER:**
27
28

1 11. Identify each and every Latino that has been elected to public office in the
2 county, or any political subdivision thereof, including the title of the office, the
3 jurisdiction of such office, and the date of such election.
4

5 **ANSWER:**
6

7 12. Identify each and every fact showing that, "Latinos, among other ethnic
8 groups, are less likely to possess the forms of identification required under Proposition
9 200 to register to vote and cast a ballot."
10

11 **ANSWER:**
12

13 Dated: December 19, 2007

Respectfully submitted,

14
15 MEXICAN AMERICAN LEGAL DEFENSE
16 AND EDUCATIONAL FUND

17 By: 

Diego M. Bernal
Attorneys for Plaintiffs
Gonzalez, et al.
18
19

20 **CERTIFICATE OF SERVICE**

21 I hereby certify that on the 19th day of December, 2007, a true and correct copy
22 of the foregoing document was hand-delivered by a courier service to:

23 M. Colleen Connor
24 MCAO Division of County Counsel
25 222 N. Central Avenue, Ste. 1100
Phoenix, Arizona 85004-2206
26

27 **COPY** served via electronic mail this 19th day of December to:

28 Dennis I. Wilenchik

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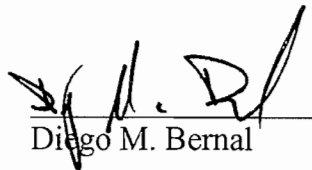
By: 
Diego M. Bernal

EXHIBIT 14



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15 Attorneys for Gonzalez Plaintiffs

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

19 Maria M. Gonzalez, et al.,) No. CV-06-1268-PHX-ROS(Lead)
20) No. CV-06-1362-PCT-ROS
Plaintiffs,) No. CV-06-1575-PCT-ROS

21 vs.)

22) **GONZALEZ PLAINTIFFS'**
23 State of Arizona, et al,) **SECOND REQUEST FOR**
24) **PRODUCTION OF DOCUMENTS**
Defendants.) **TO DEFENDANTS HIGHTOWER**
25) **MARLER AND MADRILL**

26)
27) (Assigned to the
Honorable Roslyn O. Silver)

28

1
2 To: Susan Hightower Marler, Yuma County Recorder
3 Patti Madrill, Yuma County Elections Director
4 c/o M. Colleen Connor, MCAO Division of County Counsel, 222 N.
5 Central Avenue, Suite 1100, Phoenix, AZ 85004-2206

6 Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiffs
7 request that, within thirty (30) days of service, the above-named Defendants produce the
8 documents requested in Section IV below in accordance with the Definitions and
9 Instructions set forth below. Further, the above-named Defendant are directed to
10 supplement these responses and production as provided by the same Rules. Unless
11 counsel for the parties makes another agreement, documents are to be produced at the
12 offices of the Mexican American Legal Defense and Educational Fund, Inc., 110
13 Broadway, Suite 300, San Antonio, Texas 78205.

14 I. DEFINITIONS

15 For purposes of these Requests for Production, the terms used herein shall have the
16 following meanings:

17 A. As used herein, the words “and” and “or” shall be construed either
18 conjunctively or disjunctively as required by the context to bring within the scope of
19 these requests any documents or information that might be deemed outside its scope by
20 another construction.

21 B. “Proposition 200” refers to the voting provisions of Arizona Taxpayer and
22 Citizen Protection Act that amended A.R.S. §§ 16-152, 16-166 and 16-579 in November
23 2004.
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1 C. The term “relating to” shall have its usual meaning and shall also specifically
2 mean reflecting, concerning, referring to, describing, representing, evidencing or
3 constituting.
4

5 D. “Document” and “documents” are defined to be synonymous in meaning and
6 equal in scope to the usage of the terms in Federal Rule of Civil Procedure 34(a), in its
7 broadest sense, and shall mean and include all computerized memoranda, databases,
8 spreadsheets, e-mail, any documents of identification and other information as well as
9 written, printed, typed, recorded or graphic matter of every kind and description, both
10 originals and copies, and all attachments and appendices thereto, that are in the
11 possession, custody or control of the Defendants or in the possession, custody or control
12 of the attorney for the Defendants. A draft of a non-identical copy is a separate
13 document within the meaning of this term.
14
15

16 E. Without limiting the term “control,” a document is deemed to be within
17 your control if you have ownership, possession or custody of the document, or the right
18 to secure the document or copy thereof from any persons or public or private entity
19 having physical control thereof.
20

21 F. “Person” shall mean any individual, association, agency, commission, or other
22 legal or governmental entity or association.
23

24 G. “Statement” means and includes any written or graphic statement signed or
25 otherwise adopted or approved by the users in making it, any stenographic, mechanical,
26 electrical or other recording or a written transcription which is a substantially verbatim
27 recital or an oral statement made by a person which is contemporaneously recorded.
28

1 H. "You" and "your" shall mean the Defendants, as well as all other persons
2 acting or purporting to act on behalf of the Defendants, including any attorney or other
3 representative.

4
5 I. The plural of any word used herein includes the singular, and the singular
6 includes the plural.

7
8 J. The masculine gender of any word used herein includes the feminine and the
9 neutral genders.

10 K. The past tense of any verb used herein includes the present tense, and the
11 present tense includes the past tense.

12 II. INSTRUCTIONS

13
14 1. Regarding documents called for by these requests as to which you claim a
15 privilege or which you contend are not subject to production, please provide at the time
16 for production a listing that describes each document and states with respect to each
17 such document:

- 18 a. the type of document (e.g., letter, memorandum, report, etc.);
- 19 b. the date;
- 20 c. the title;
- 21 d. the number of pages;
- 22 e. the author or addressor;
- 23 f. the names and address or addresses of any persons who have
24 received and/or who have obtained a copy of the document;
- 25 g. the subject matter of the document;
- 26
- 27
- 28

1 Provide all documents related to efforts to educate or inform the public that
2 making photocopies of one's United States Certificate of Naturalization is legal, or not
3 illegal.
4

5 **Request for Production No. 5:**

6 Provide all documents related to any investigation into whether, or any
7 determination that, making a copy of a Certificate of Naturalization is legal, or not
8 illegal.
9

10 **Request for Production No. 6:**

11 Documents showing, by month: the number of voter registration applications
12 received by the County Recorder's office; the number of voter registration applications
13 rejected for failure to provide proof of citizenship pursuant to Proposition 200; the
14 number of voter registration applications rejected for reasons other than failure to
15 provide proof of citizenship pursuant to Proposition 200; the number of successful voter
16 registration applications (i.e. that resulted, without further supplementation, in the
17 applicant being added to the voter rolls), for the period July 1, 2004 to December 1,
18 2007 (applies to documents not already produced to ITCA Plaintiffs before 12/01/07).
19
20

21 **Request for Production No. 7:**

22 Provide all documents showing the names and addresses of voter registration
23 applicants whose applications were rejected for reasons other than failure to provide
24 proof of citizenship pursuant to Proposition 200, by month, since January 1, 2005.
25

26 **Request for Production No. 8:**

27
28

1 Provide all documents related to fraud involving military personnel registering to
2 vote using the federal post card application.

3 **Request for Production No. 9:**

4
5 Provide all documents related to fraud involving military personnel registering to
6 vote using the federal post card application.

7 **Request for Production No. 10:**

8 Produce all documents related to complaints made by, or reports of problems
9 experienced by, individuals registering to vote or voting from January 1, 2000 to the
10 present.

11
12 **Request for Production No. 11:**

13 Produce all documents related to communications between the county and voter
14 registration organizations, including, but not limited to, communications between the
15 county and political parties, nonprofit organizations and private companies conducting
16 voter registration, since January 1, 2004.

17
18 **Request for Production No. 12:**

19 Produce all documents showing the amount and purpose of federal funds
20 received by the county for election and voter registration related activities since January
21 1, 2004.

22
23 **Request for Production No. 13:**

24 Produce all documents related to any history of official discrimination that
25 touches the right of any Latino to register, to vote, or otherwise to participate in the
26 democratic process.
27
28

1 **Request for Production No. 14:**

2 Produce all documents related to any racially polarized voting in the County.

3 **Request for Production No. 15:**

4
5 Produce all documents related to unusually large election districts, majority vote
6 requirements, anti-single shot provisions, or other voting practices or procedures that
7 may enhance the opportunity for discrimination against Latinos.

8 **Request for Production No. 16:**

9
10 Produce all documents related to any candidate slating in the County, or any
11 political subdivision thereof.

12 **Request for Production No. 17:**

13
14 Produce all documents related to the discrimination against Latinos in such areas
15 as education, employment and health, which hinder their ability to participate
16 effectively in the political process.

17 **Request for Production No. 18:**

18
19 Produce all documents related to overt racial appeals with regard to Latinos in
20 political campaigns in the County.

21 **Request for Production No. 19:**

22
23 Produce all documents which indicate each and every Latino/Hispanic that has
24 been elected to public office in the County, or any political subdivision thereof,
25 including the title of the office, the jurisdiction of such office, and the date of such
26 election.

27 **Request for Production No. 20:**

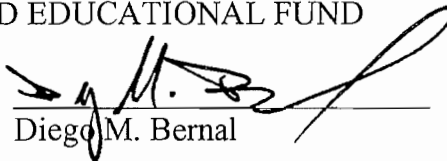
1 Produce all documents related to whether Latinos are less likely to possess the
2 forms of identification required under Proposition 200 to register to vote and cast a
3 ballot.
4

5 Dated: December 19, 2007

Respectfully submitted,

6 MEXICAN AMERICAN LEGAL DEFENSE
7 AND EDUCATIONAL FUND

8 By:


Diego M. Bernal

9
10 Attorneys for Plaintiffs
11 Gonzalez, et al.

12 CERTIFICATE OF SERVICE

13 I hereby certify that on the 19th day of December, 2007, a true and correct copy of the
14 foregoing document was hand-delivered by a courier service to:

15 M. Colleen Connor
16 MCAO Division of County Counsel
17 222 N. Central Avenue, Ste. 1100
18 Phoenix, Arizona 85004-2206
(602) 506-8567 (fax)

19 **COPY** served via electronic mail this 19th day of December to:

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22 Wilenchik and Bartness, P.C.
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24 2810 North Third Street
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27 Solicitor General
Carrie J. Brennan
28 Barbara A. Bailey
Assistant Attorneys General

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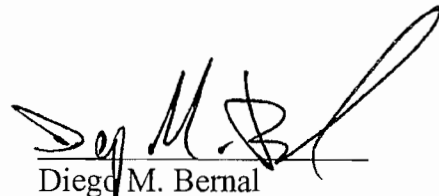
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17 Attorneys for The Inter Tribal Council of Arizona, Inc., et al.

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24 Attorneys for Navajo Nations

25
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By:



Diego M. Bernal
Counsel for Plaintiffs, Gonzalez, et al.

EXHIBIT 15

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12 State Bar No. 05350
13 Kathleen Rapp, Esq.
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21 *Attorneys for Thirteen County Recorders*
22 *and Thirteen Elections Directors*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

17 Maria M. Gonzalez, et al.,
18 Plaintiffs,
19 v.
20 State of Arizona, et al.,
21 Defendants.

NO. CV06-1268-PHX-ROS (LEAD)
NO. CV06-1362-PCT-JAT
NO. CV06-1575-PHX-ROS
(Consolidated)

**DEFENDANT YUMA COUNTY'S
RESPONSE TO GONZALEZ
PLAINTIFFS' FIRST SET OF
INTERROGATORIES TO
DEFENDANTS MARLER AND
MADRILL**

1 Defendants Yuma County Recorder Susan Hightower Marler and Yuma
2 County Elections Director Patti Madrill (Yuma County), by and through
3 undersigned counsel, hereby submit the following Responses to Gonzalez
4 Plaintiffs' First Set of Interrogatories to County Defendants.

5 **General Objections**

6 The following objections are applicable to and incorporated into each
7 answer.

- 8 1. Defendant objects to each Interrogatory served by Plaintiff in this
9 action to the extent that it is overbroad, burdensome, oppressive,
10 vague, or generally unspecific as to what a complete answer is.
- 11 2. Defendant asserts these objections without waiving or intending to
12 waive any objections as to competence, relevance, materiality,
13 conclusion of law or privilege.

14 **INTERROGATORIES**

15 **Interrogatory No. 1:** Identify all facts related to fraud involving military
16 personnel registering to vote using the federal post card application.

17 **Answer:** Defendants object to the interrogatory to the extent that it is
18 premised on a legal conclusion. Without waiving any objection, Defendants are
19 not aware of any facts showing fraud involving military personnel registering to
20 vote using the federal post card application.

21 **Interrogatory No. 2:** Identify all facts showing fraud in the submission of
22 federal voter registration forms.

1 **Answer:** Defendants object to the interrogatory to the extent that it is
2 premised on a legal conclusion. Without waiving any objection, Defendants are
3 not aware of any facts showing fraud in the submission of federal voter
4 registration forms.

5 **Interrogatory No. 3:** State the number of persons who registered to vote, by
6 month, but whom were not required to show proof of citizenship under
7 Proposition 200 because they were already registered in the county.

8 **Answer:** Defendants object to the interrogatory to the extent that it is so
9 broad, uncertain and unintelligible that Defendants cannot determine the nature
10 of the information sought, and therefore unable to answer.

11 **Interrogatory No. 4:** State the number of persons who registered to vote, by
12 month, but whom were not required to show proof of citizenship under
13 Proposition 200 because they were already registered in the county.

14 **Answer:** Defendants object to the interrogatory to the extent that it is
15 vague and ambiguous, and imposes an excessive and unreasonable burden.

16 **Interrogatory No. 5:** Identify each and every fact related to the presence or
17 absence of a history of official discrimination that touches the right of any Latino
18 to register, to vote, or otherwise to participate in the democratic process.

19 **Answer:** Defendants object to the interrogatory to the extent that it is
20 premised on a legal conclusion, the interrogatory is vague and ambiguous as to
21 what a complete and full answer is, and imposes an excessive and
22 unreasonable burden.

1 **Interrogatory No. 6:** Identify each and every fact related to the presence or
2 absence of racially polarized voting in the county.

3 **Answer:** Defendants object to the interrogatory to the extent that it is
4 premised on a legal conclusion, the interrogatory is vague and ambiguous as to
5 what a complete and full answer is, and imposes an excessive and
6 unreasonable burden.

7 **Interrogatory No. 7:** Identify each and every fact related to the presence or
8 absence of unusually large election districts, majority vote requirements, anti-
9 single shot provisions, or other voting practices or procedures that may enhance
10 the opportunity for discrimination against Latinos.

11 **Answer:** Defendants object to the interrogatory to the extent that it is
12 premised on a legal conclusion, the interrogatory is vague and ambiguous as to
13 what a complete and full answer is, and imposes an excessive and
14 unreasonable burden.

15 **Interrogatory No. 8:** Identify each and every fact related to the presence or
16 absence of a candidate slating process in the county, or any political subdivision
17 thereof, and that Latinos have been denied access to the process.

18 **Answer:** Defendants object to the interrogatory to the extent that it is
19 premised on a legal conclusion, the interrogatory is vague and ambiguous as to
20 what a complete and full answer is, and imposes an excessive and
21 unreasonable burden.

22 **Interrogatory No. 9:** Identify each and every fact related to the presence or

1 absence of discrimination against Latinos in such areas as education,
2 employment and health, which hinder their ability to participate effectively in the
3 political process.

4 **Answer:** Defendants object to the interrogatory to the extent that it is
5 premised on a legal conclusion, the interrogatory is vague and ambiguous as to
6 what a complete and full answer is, and imposes an excessive and
7 unreasonable burden.

8 **Interrogatory No. 10:** Identify each and every fact related to the presence or
9 absence of overt racial appeals with regard to Latinos in political campaigns in
10 the county, or any political subdivision thereof.

11 **Answer:** Defendants object to the interrogatory to the extent that it is
12 premised on a legal conclusion, the interrogatory is vague and ambiguous as to
13 what a complete and full answer is, and imposes an excessive and
14 unreasonable burden.

15 **Interrogatory No. 11:** Identify each and every Latino that has been elected to
16 public office in the county, or any political subdivision thereof, including the title
17 of the office, the jurisdiction of such office, and the date of such election.

18 **Answer:** Defendants object to the interrogatory to the extent that it is
19 premised on a legal conclusion, the interrogatory is vague and ambiguous as to
20 what a complete and full answer is, and imposes an excessive and
21 unreasonable burden.

22 **Interrogatory No. 12:** Identify each and every fact showing that, "Latinos,

1 among other ethnic groups, are less likely to possess the forms of identification
2 required under Proposition 200 to register to vote and cast a ballot.”

3 **Answer:** Defendants object to the interrogatory to the extent that it is
4 premised on a legal conclusion, the interrogatory is vague and ambiguous as to
5 what a complete and full answer is, and imposes an excessive and
6 unreasonable burden.

7 RESPECTFULLY SUBMITTED this 18th day of January 2008.

8 ANDREW P. THOMAS
9 MARICOPA COUNTY ATTORNEY

10 BY: /s/ Colleen Connor
11 COLLEEN CONNOR
12 Deputy County Attorney

13 -and-

14 DENNIS I. WILENCHIK, ESQ.
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