

1 Nina Perales, TX SBN: 24005046
Diego Bernal, TX SBN: 24048350
2 MEXICAN AMERICAN LEGAL
DEFENSE AND EDUCATIONAL FUND
110 Broadway, Suite 300
3 San Antonio, TX 78205
Ph: (210) 224-5476
nperales@maldef.org
4 dbernal@maldef.org

5 Daniel R. Ortega, Jr., SBN: 005015
ROUSH, MCCRACKEN, GUERRERO,
MILLER & ORTEGA
6 650 North Third Avenue
Phoenix, Arizona 85003
7 Ph: (602) 253-3554
danny@rmgmoinjurylaw.com

8 Karl J. Sandstrom
PERKINS COIE, LLP
9 607 Fourteenth Street, N.W., Suite 800
Washington, D.C. 20005
10 (202)434-1639
ksansdstrom@perkinscoie.com

11 Attorneys for Gonzalez Plaintiffs

12
13 IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

14 Maria M. Gonzalez, et al.,) No. CV-06-1268-PHX-ROS(Lead)
15) No. CV-06-1362-PCT-JAT(Cons.)
Plaintiffs,) No. CV-06-1575-PHX-EHC(Cons.)
16)
vs.) GONZALEZ PLAINTIFFS'
17) MOTION TO ADMIT STIPULATED
State of Arizona, et al,) EXHIBITS INTO EVIDENCE
18)
Defendants.) (Assigned to the
19) Honorable Roslyn O. Silver)
20)

21 NOW COME Gonzalez Plaintiffs and file this Motion to Admit Stipulated
22 Exhibits into Evidence. In support of their Motion, Gonzalez Plaintiffs show the

1 following:

2 On July 9, 2008, the County Defendants filed Gonzalez Plaintiffs' and Twelve
3 County Defendants' Stipulation Re Authenticity and Withdrawal of Subpoenas. *See*
4 Dkt. Entry No. 933. Parties stipulated the following exhibits are authentic, have
5 foundation and do not contain first generation hearsay. Defendants reserved objections
6 to other objections, such as hearsay within hearsay, that the testimony of a County
7 Defendant could not remedy. *See* Dkt. Entry. No. 933.

8 143, 144, 204, 207, 208-210, 214, 216, 217, 220, 222-225, 227-232, 234-239, 242, 243,
9 247, 255, 259, 261-265, 269-271, 273-277, 280, 287-290, 324-329, 331-334, 336, 338-
10 340, 343-345, 348, 399-402, 407, 408, 410, 411, 413, 415, 417, 418, 421-426, 438, 440,
11 441, 449, 455, 457-462, 467-485, 488, 490-493, 495, 497, 512, 513, 516-519, 524, 525,
12 527-531, 573, 577-579, 628-630, 632, 637, 639, 641-644, 648-652, 900, 914, 915, 959

11 Gonzalez Plaintiffs have notified State and 12 County Defendants that Gonzalez
12 Plaintiffs would move the admission of the above-listed exhibits and in order to provide
13 them the opportunity to prepare their specific objections to the exhibits. *See* Ex. A (July
14 14, 2008 email).

15 For the above reasons, Gonzalez Plaintiffs respectfully request that the Court to
16 admit the above listed trial exhibits into evidence.

17

18 **RESPECTFULLY SUBMITTED** this 14th day of July, 2008

19

20

By: s/Nina Perales
Nina Perales

21

Counsel for Plaintiffs
Gonzalez, et al.

22

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

By: s/ Nina Perales for
Dennis I. Wilenchik (# 05350)
Kathleen Rapp (# 023982)
WILENCHIK AND BARTNESS, P.C.
The Wilenchik & Bartness Building
2810 North Third Street
Phoenix, Arizona 85004
Telephone (602) 606-2810
DIW@wb-law.com
KatheenR@wb-law.com
Attorneys for County Defendant

By: s/ Nina Perales for
Mary O'Grady
Solicitor Attorney General
Steven La Mar
Senior Litigation Counsel
Barbara Bailey
Assistant Attorney General
1275 West Washington Street
Phoenix, Arizona 86007
Attorneys for State Defendants

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of July, 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.

COPY of the foregoing filed electronically this 14th day of July, 2008.

COPY of the foregoing mailed with Notice of Electronic Filing this 14th day of July, 2008 to:

The Honorable Roslyn O. Silver
United States District Court
Sandra Day O’Connor U.S. Courthouse, Suite 624
401 West Washington Street, SPC 59
Phoenix, AZ 85003-2158

s/Nina Perales
Nina Perales

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22