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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,  
441, 449, 455, 457-462, 467-485, 488, 490-493, 495, 497, 512, 513, 516-519, 524, 525,  
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 15th day of July, 2008

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By:       s/Nina Perales  
Nina Perales

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**Counsel for Plaintiffs**  
**Gonzalez, et al.**

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CERTIFICATE OF SERVICE

I hereby certify that on the 15th 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 15<sup>th</sup> day of July, 2008.

COPY of the foregoing mailed with Notice of Electronic Filing this 15<sup>th</sup> 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

# **EXHIBIT A**

## Nina Perales

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**From:** Nina Perales **Sent:** Mon 7/14/2008 12:01 PM  
**To:** Barbara Bailey; Diego Bernal; Marisol Perez; Sara Greene; Karen Hartman; Nicholas Espiritu  
**Cc:** Carrie Brennan; Colleen Connor; Kathleen E. Rapp; Marisa Bono  
**Subject:** RE: Gonzalez Plaintiffs' Trial Exhibits  
**Attachments:**

Dear Counsel,

Please note that later today we will file a motion seeking to admit into evidence the following Gonzalez Plaintiffs' trial exhibits. For your convenience in evaluating the trial exhibits listed below, we provided you on Thursday July 10 a conversion chart showing the previous SJ numbers for our trial exhibits.

This list of exhibits is different from the one sent a few minutes ago in that you may have objections to these exhibits outside of basic hearsay and foundation. I am providing you this list so that you have the opportunity to review the exhibits and prepare your objections, if you have any. Thanks.

Gonzalez Trial Exhibits (documents originally produced by the counties) that were the subject of stipulations regarding authenticity, foundation, and 1st generation hearsay:

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

8, 123, 226, 241, 248, 251-253, 278, 317-321, 404, 405, 442-444, 445-447, 450-454, 600-616, 620-627, 645-647, 723, 724, 761-763

218, 240, 245, 246, 330, 406, 419, 486