

1 Nina Perales, TX SBN: 24005046
2 Diego Bernal, TX SBN: 24048350
3 MEXICAN AMERICAN LEGAL
4 DEFENSE AND EDUCATIONAL FUND
5 110 Broadway, Suite 300
6 San Antonio, TX 78205
7 Ph: (210) 224-5476
8 nperales@maldef.org
9 dbernal@maldef.org

10 Daniel R. Ortega, Jr., SBN: 005015
11 ROUSH, MCCRACKEN, GUERRERO,
12 MILLER & ORTEGA
13 650 North Third Avenue
14 Phoenix, Arizona 85003
15 Ph: (602) 253-3554
16 danny@rmgmoinjurylaw.com

17 Karl J. Sandstrom
18 PERKINS COIE, LLP
19 607 Fourteenth Street, N.W., Suite 800
20 Washington, D.C. 20005
21 (202)434-1639
22 ksansdstrom@perkinscoie.com

23 Attorneys for Gonzalez Plaintiffs

24 IN THE UNITED STATES DISTRICT COURT
25 FOR THE DISTRICT OF ARIZONA

26 Maria M. Gonzalez, et al.,)	No. CV-06-1268-PHX-ROS(Lead)
)	No. CV-06-1362-PCT-JAT(Cons.)
Plaintiffs,)	No. CV-06-1575-PHX-EHC(Cons.)
)	
vs.)	GONZALEZ PLAINTIFFS' NOTICE
)	OF SUPPLEMENTAL MATERIAL
State of Arizona, et al,)	REQUESTED BY COURT
)	REGARDING DISCLOSURE OF LAY
Defendants.)	WITNESSES
)	
)	(Assigned to the
)	Honorable Roslyn O. Silver)

27 Now come Gonzalez Plaintiffs and provide the Court with additional requested
28 information regarding Gonzalez Plaintiffs' knowledge of and communication with proposed lay
29 witnesses affected by Proposition 200.
30

1 Gonzalez Plaintiffs hereby submit a chart that shows the dates that Gonzalez Plaintiffs
2 received the relevant production from County Defendants regarding these individuals; dates
3 that Gonzalez Plaintiffs were able to complete the data entry and create the address files for
4 letters to be sent to these individuals; dates that the letters were sent; the dates when the
5 individuals came forward and contacted Gonzalez Plaintiffs' counsel; and dates on which
6 Gonzalez Plaintiffs supplemented their disclosures or otherwise notified Defendants of the
7 individuals. *See Ex. 1.* Gonzalez Plaintiffs have also attached supplemental materials
8 supporting the information on the chart. *See Ex. A-L;* and Docket Nos. 813 and 877.

9 With this Notice, Gonzalez Plaintiffs renew their request that the proposed lay
10 witnesses described in Notice be permitted to testify at trial either through live testimony,
11 declaration or through deposition.

12
13
14 DATED this 14th day of July, 2008.

Respectfully submitted,

15
16 By: s/Nina Perales
Nina Perales

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

19 CERTIFICATE OF SERVICE

20 I hereby certify that on the 14th day of July, 2008, I caused the foregoing document to
21 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.

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

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

25 The Honorable Roslyn O. Silver
26 United States District Court

1 Sandra Day O'Connor U.S. Courthouse, Suite 624
2 401 West Washington Street, SPC 59
3 Phoenix, AZ 85003-2158

s/Nina Perales
Nina Perales

4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26