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10 **IN THE UNITED STATES DISTRICT COURT**
11 **DISTRICT OF ARIZONA**

12 MARIA M. GONZALEZ, et al.,

13 Plaintiffs,

14 v.

15 STATE OF ARIZONA, et al.

16 Defendants.

No. CV06-01268 PHX ROS
No. CV06-1362 PCT ROS (Cons)
No. CV06-1575 PCT ROS (Cons)

**JOINT STIPULATION AND
REQUEST TO MODIFY EXPERT
DISCOVERY DEADLINES BY
NAVAJO NATION PLAINTIFFS
AND DEFENDANT ARIZONA
SECRETARY OF STATE**

(Assigned to the Honorable
Roslyn O. Silver)

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1 Defendant Arizona Secretary of State, Janice Brewer (“Defendant”), and
2 Plaintiffs Navajo Nation and Agnes Laughter (“Plaintiffs”) agree and stipulate as
3 follows, with regard to the Navajo Nation case (No. CV 06-1575):

4 1. Defendant and Plaintiffs are, and have been, in the process of exploring
5 possibilities for resolving the issues raised in the Navajo Nation case without the need
6 for additional litigation.

7 2. The parties desire to continue their present discussions with the hope of
8 each party avoiding additional litigation expense in the event the claims may be resolved
9 without further litigation.

10 3. The deadline for the Defendant’s service of her expert evidence should be
11 extended from February 15, 2008, until February 29, 2008.

12 4. The deadline for the Plaintiffs’ service of their expert rebuttal evidence, if
13 any, should be extended from March 7, 2008, until March 21, 2008.

14 5. The deadline for completing expert discovery should be extended from
15 March 21, 2008, until March 28, 2008.

16 6. The requested extensions would not otherwise affect any other deadlines
17 set out in the case schedule for these consolidated actions, including any trial date to be
18 set in this matter.

19 7. The parties respectfully request that the Court enter the proposed form of
20 order, which is lodged herewith.

21 DATED this 13th day of February, 2008.

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SACKS TIERNEY PA

s/Judith M. Dworkin
Judith M. Dworkin

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 13th day of February, 2008, I electronically
3 transmitted the attached document to the Clerk's Office using the ECF System for
4 filing, and transmittal of a Notice of Electronic Filing to the following ECF registrants:
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