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

18 Maria M. Gonzalez, et al.,) No. CV-06-1268-PHX-ROS(Lead)
19) No. CV-06-1362-PCT-ROS
20 Plaintiffs,) No. CV-06-1575-PCT-ROS
21)
22 vs.)
23 State of Arizona, et al,) **STIPULATION OF**
24) **CONFIDENTIALITY**
25)
26 Defendants.) (Assigned to the Honorable Roslyn O.
27) Silver)
28)

1 All parties to the above-captioned litigation hereby stipulate that any and all
2 information obtained from voter registration forms or the voter registration database and
3 described as confidential by A.R.S. § 16-168(F)—including the month and day of birth,
4 social security numbers and any portion thereof, driver license numbers or nonoperating
5 identification numbers, unique identifying numbers prescribed by A.R.S. § 16-168,
6 Indian census numbers, father’s name or mother’s name, state or country of birth, and
7 voter signatures—will be held in the highest confidence and will not be transmitted in
8 any way, in part or in full, to any person or organization not exempted below.
9

10 Information obtained from voter registration forms includes any information
11 communicated to any federal, state, or local governmental agency via the voter
12 registration forms. This information is protected regardless of whether it has been
13 disclosed in the form of copies of the voter registration form, spreadsheet, or other lists
14 or databases.
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17 Individuals entitled to access confidential information include: (1) counsel for the
18 parties, including paralegals, clerks, and other legal staff as deemed necessary by
19 counsel; (2) the named individual parties in this action, to the extent necessary, as
20 determined by counsel; (3) official representatives of the organizational parties, as
21 determined by counsel, excluding volunteers except as by order of the Court; (4) experts
22 and consultants retained by the parties in this case; (5) the Court; court personnel, court
23 reporters and language interpreters; (6) and those individuals upon whom counsel for
24 all named parties agree, in writing, to permit disclosure. All individuals with access to
25 confidential information should make every effort to ensure its security. In the case of
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1 inadvertent disclosure, the individual who has disclosed the information shall
2 immediately notify counsel for all named parties and shall immediately make every
3 effort to secure the disclosed information or ensure that it has been promptly destroyed.
4

5 All individuals specified in (1) – (6) above and to whom confidential information is
6 disclosed pursuant to this stipulation must first execute an Agreement to Abide by
7 Stipulation and Protective Order (attached as Exhibit 1) and file it with the Court.
8

9 At the conclusion of the above-captioned case, all confidential information shall
10 be returned to the party that disclosed it or shall be promptly destroyed. Nothing in this
11 stipulation of confidentiality will preclude the disclosure of discoverable information
12 between parties or otherwise affect the admissibility of evidence during trial. Federal
13 Rule of Civil Procedure 26(b), the Federal Rules of Evidence, and any applicable legal
14 authority will govern the disclosure and admissibility of evidence in this case.
15

16 Respectfully submitted this 25th day of October, 2007.

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ORIGINAL ELECTRONICALLY filed
this 25th day of October, 2007.

COPY of the foregoing mailed with Notice
of Electronic Filing this 25th day of October, 2007 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
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s/Nina Perales
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