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22 of Arizona, Inc., et al.

23 UNITED STATES DISTRICT COURT  
24 DISTRICT OF ARIZONA

25 Maria M. Gonzalez, et al., )  
26 ) No. CV06-01268-PHX-ROS (Lead)  
27 ) No. CV06-01362-PCT-JAT (Cons)  
28 ) Plaintiffs, )

29 vs. )

30 State of Arizona; Jan Brewer, in her )  
31 official capacity as Secretary of State of )  
32 the State of Arizona, et al., )  
33 Defendants. )

34 The Inter Tribal Council of Arizona, )  
35 Inc., et al. )

36 Plaintiffs, )

37 vs. )

38 Jan Brewer, in her official capacity as )  
39 Secretary of State of Arizona, )  
40 Defendant. )

**AMENDED NOTICE OF  
DEPOSITION OF THE OFFICE  
OF THE PIMA COUNTY  
RECORDER PURSUANT TO  
F.R.C.P. 30(b)(6) BY  
PLAINTIFFS INTER TRIBAL  
COUNCIL OF ARIZONA, INC.,  
ET AL.**

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TO: F. Ann Rodriguez, in her official capacity as Pima County Recorder, through her counsel of record, Colleen Connor, Deputy County Attorney, Maricopa County Attorney's Office, Division of County Counsel, 222 North Central Avenue, Suite 1100, Phoenix, Arizona 85003.

Plaintiffs give notice that they will take the deposition pursuant to Fed. R. Civ. P. 30(b)(6) of the Office of the Pima County Recorder. Defendant Rodriguez has a duty pursuant to Rule 30(b)(6) to designate one or more employees of the Office of the Pima County Recorder, or other persons who consent to testify on its behalf, and such person(s) shall testify as to the matters known, or reasonably available to the Office of the Pima County Recorder, on the topics specified in the attached Schedule A.

The deposition shall take place at the office of the Pima County Recorder, 115 North Church Avenue, Tucson, Arizona 85701 on August 2, 2006 at 9:30 a.m.

Requests for reasonable accommodations for persons with disabilities must be made at least three judicial days in advance of the deposition.

DATED this 27th day of July, 2006.

STEPTOE & JOHNSON LLP

By /s/ Karen J. Hartman-Tellez  
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1 CERTIFICATE OF SERVICE

2 I hereby certify that on the 27th day of July, 2006, I caused the foregoing  
3 document to be electronically transmitted to the Clerk's Office using the CM/ECF  
4 System for filing and transmittal of a Notice of Electronic Filing to the following  
5 CM/ECF Registrants:

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Attorneys for County Defendants, except Coconino County

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Attorney for Coconino County Defendants

Also on the 27th day of July, 2006, I caused a copy of the foregoing document to be mailed to:

Paul Grossman  
Court Reporter  
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/s/ Michele L. Galvez  
Michele L. Galvez, Legal Secretary

1  
2 **SCHEDULE A**

3 Pursuant to Fed. R. Civ. P. 30(b)(6), Plaintiffs Inter Tribal Council of Arizona,  
4 Inc., et al. set forth below the following subject matter areas for the deposition of  
5 defendant F. Ann Rodriguez and the Office of the Pima County Recorder (the “County  
6 Recorder”):

7 1. The County Recorder’s implementation of the voting-related  
8 provisions of the Arizona Taxpayer and Citizen Protection Act (amending A.R.S. §§ 16-  
9 152, 16-166 and 16-579) (“the Act”), including but not limited to (a) the development  
10 and promulgation of implementing regulations; (b) communications with the Arizona  
11 Secretary of State and other county recorders’ offices regarding implementation of, and  
12 compliance with, the Act (including instructions, recommendations and directives  
13 regarding the Act); (c) efforts to educate voters regarding the requirements of the Act;  
14 and (d) efforts to train poll workers and other election officials regarding the Act.

15 2. The degree to which Arizona citizens in Pima County are unable to  
16 register to vote as a result of the amendment to A.R.S. § 16-152 (requiring that voter  
17 registration forms contain proof of United States citizenship) including, but not limited  
18 to: (a) the numbers and rates of rejection of voter registration forms since the date of  
19 implementation of the Arizona Taxpayer and Citizen Protection Act due to failure to  
20 provide satisfactory proof of citizenship as required by the Act; and (b) any analyses,  
21 reports or studies conducted by or for, or in the possession of, the County Recorder  
22 regarding the above.

23 3. The impact upon the ability of Arizona citizens to cast a regular  
24 ballot at a polling place in elections conducted in Pima County since the implementation  
25 of the amendment to A.R.S. § 16-579 (requiring voters to present certain forms of  
26 identification at the polling place) including, but not limited to: (a) the number of  
27 registered voters who were not permitted to cast a regular ballot at the polling place  
28 during each such election due to the failure to provide identification required by A.R.S.

1 § 16-579; (b) the number of voters who cast a provisional ballot due to the failure to  
2 provide identification required by A.R.S. § 16-579, and of those voters, the number who  
3 subsequently provided satisfactory proof of identification to the County Recorder; and  
4 (c) any analyses, reports or studies conducted by or for, or in the possession of, the  
5 County Recorder regarding the above.

6           5. Any and all information in the possession of the County Recorder  
7 relating to any incident since January 1, 1996, involving allegations that a non-United  
8 States citizen was registered to vote in Pima County.

9           6. Any and all information in the possession of the County Recorder  
10 relating to any incident since January 1, 1996, involving allegations that a non-United  
11 States citizen voted at a polling place in Pima County.

12           7. Any and all information in the possession of the County Recorder  
13 relating to any incident since January 1, 1996, involving allegations that a non-United  
14 States citizen voted in Pima County by early ballot pursuant to A.R.S. § 16-542(A).

15           8. Any and all information in the possession of the County Recorder  
16 relating to any incident since January 1, 1996, involving allegations that an individual  
17 impersonated a registered voter at a polling place in Pima County.

18           9. The forms of identification that have been deemed acceptable by  
19 the County Recorder to establish the identity of electors in Pima County in accordance  
20 with the requirements of A.R.S. § 16-579(A).