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21 Attorneys for The Inter Tribal Council  
22 of Arizona, Inc., et al.

23 UNITED STATES DISTRICT COURT

24 DISTRICT OF ARIZONA

25 Maria M. Gonzalez, et al.,  
26  
27 Plaintiffs,  
28  
29 vs.  
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31 State of Arizona; Jan Brewer, in her  
32 official capacity as Secretary of State of  
33 the State of Arizona, et al.,  
34  
35 Defendants.

36  
37 The Inter Tribal Council of Arizona,  
38 Inc., et al.  
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40 Plaintiffs,  
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42 vs.  
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44 Jan Brewer, in her official capacity as  
45 Secretary of State of Arizona,  
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47 Defendant.

) No. CV06-01268-PHX-ROS (Lead)  
) No. CV06-01362-PCT-JAT (Cons)

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

1 TO: Laurette Justman, in her official capacity as Navajo County  
2 Recorder, through her counsel of record, Colleen Connor, Deputy  
3 County Attorney, Maricopa County Attorney's Office, Division of  
4 County Counsel, 222 North Central Avenue, Suite 1100, Phoenix,  
5 Arizona 85003.

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

12 The deposition shall take place at the offices of Steptoe and Johnson LLP,  
13 Collier Center, 201 East Washington Street, Suite 1600, Phoenix, Arizona 85004 on  
14 July 28, 2006 at 1:30 p.m.

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

17 DATED this 21st day of July, 2006.

18 STEPTOE & JOHNSON LLP

19 By /s/ Karen J. Hartman-Tellez  
20 David J. Bodney  
21 Karen J. Hartman-Tellez  
22 Collier Center  
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Arizona, Inc., et al.

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1 CERTIFICATE OF SERVICE

2 I hereby certify that on the 21st 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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21 her official capacity as the Secretary of State of the state of  
22 Arizona

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Attorneys for County Defendants except Coconino County

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Attorney for Coconino County Defendants

Also on the 21st day of July, 2006, I caused a copy of the foregoing document to be mailed to:

Paul Grossman  
Court Reporter  
14601 North 10th Way  
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/s/ Michele L. Galvez  
Michele L. Galvez, Legal Secretary

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**SCHEDULE A**

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

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

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

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

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

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