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14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF ARIZONA**

16 Maria M. Gonzalez, et al.,

17 Plaintiffs,

18 v.

19 State of Arizona, et al.,

20 Defendants.

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

23 Plaintiffs,

24 v.

25 Jan Brewer, in her official capacity as
26 Secretary of State of Arizona,

27 Defendant.

Case No. CV-06-1268-PHX-ROS

**GONZALEZ PLAINTIFFS'
REQUESTS FOR ADMISSION**

(Assigned to the Honorable
Roslyn O. Silver)

28 Pursuant to Fed. R. Civ. P. 36, Gonzalez Plaintiffs hereby request that Defendants
respond within thirty days of service to the following requests for admission in
accordance with the definitions and instructions set forth below.

1 **Definitions and Instructions**

2 Gonzalez Plaintiffs requests and instructs that Defendants answer the following
3 requests for admission in accordance with the following definitions and instructions:
4

5 A. Each request for admission shall be answered separately and fully in writing under
6 oath.

7
8 B. If you cannot answer any request for admission in full after exercising due
9 diligence to secure the full information to do so, so state and answer to the extent
10 possible, setting forth in detail the reasons why you cannot truthfully admit or deny the
11 matter and detailing what you did in attempting to secure the unknown information.

12
13 C. The singular includes the plural and vice versa; the terms “and” and “or” shall be
14 both conjunctive and disjunctive; and the past tense includes the present tense and vice
15 versa.

16
17 D. Your failure to admit any request for admission requires that you supplement your
18 response to admit the matter if you, or any person acting on your behalf, subsequently
19 obtains additional information indicating that the matter should be admitted.

20
21 E. “Proposition 200” is defined as the voting-related provisions of the Arizona
22 Taxpayer and Citizen Protection Act ballot initiative which amended A.R.S. §§ 16-152,
23 16-166, and 16-579 and passed in November 2004.

24 **Further Requests for Admission**

25 33. Admit that the cost to obtain a non-operating Arizona Identification card is \$12.00.
26
27

1 34. Admit that the cost to obtain a duplicate Arizona Driver's License or an Arizona non-
2 operating license is \$4.00.

3
4 35. Admit that an individual attempting to renew their Arizona Driver's License must
5 visit a driver license office in person to complete the application process and have a new
6 photo taken.

7
8 36. Admit that the cost to obtain a copy of a certified out-of-state birth certificate is a
9 minimum of \$7 not including shipping and handling costs.

10 37. Admit that individuals attempting to obtain a certified out-of-state birth certificate
11 cannot obtain his or her birth certificate the same day he or she request it and many states
12 require multiple weeks for delivery.

13
14 Date: August 2, 2006

Respectfully submitted,

15
16 By: s/Nina Perales

Nina Perales

17 Counsel for Plaintiffs' Gonzalez, et al.

18 COPY of the foregoing filed electronically
19 this 2nd day of August, 2006.

20 COPY of the foregoing mailed with Notice
21 of Electronic Filing this 2nd day of August, 2006 to:

22 The Honorable Roslyn O. Silver
23 United States District Court
24 Sandra Day O'Connor U.S. Courthouse, Suite 624
25 401 West Washington Street, SPC 59
Phoenix, AZ 85003-2158

26 s/Nina Perales