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17 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

18 **IN AND FOR THE COUNTY OF MARICOPA**

19 MARICOPA COUNTY REPUBLICAN
20 PARTY, APACHE COUNTY
21 REPUBLICAN PARTY, NAVAJO
22 COUNTY REPUBLICAN PARTY, and
23 YUMA COUNTY REPUBLICAN PARTY,

24 Plaintiffs,

25 STATE OF ARIZONA, ex rel. MARK
26 BRNOVICH, Attorney General,

27 Proposed Intervenor-Plaintiff

28 vs.

MICHELE REAGAN, in her official
capacity as Arizona Secretary of State;
EDISON J. WAUNKA, in his official
capacity as Apache County Recorder;
DAVID W. STEVENS, in his official
capacity as Cochise County Recorder;
PATTY HANSEN, in her official capacity

Case No: CV2018-013963

**STATE OF ARIZONA'S: (1) MOTION
TO INTERVENE AS PLAINTIFF AND
(2) APPLICATION FOR TEMPORARY
RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

(Assigned to the Hon. Margaret Mahoney)

1 as Coconino County Recorder; SADIE JO
2 BINGHAM, in her official capacity as Gila
3 County Recorder; WENDY JOHN, in her
4 official capacity as Graham County
5 Recorder; BERTA MANUZ, in her official
6 capacity as Greenlee County Recorder;
7 SHELLY BAKER, in her official capacity
8 as La Paz County Recorder; ADRIAN
9 FONTES, in his official capacity as Maricopa
10 County Recorder; KRISTI BLAIR, in her
11 official capacity as Mohave County Recorder;
12 DORIS CLARK, in her official capacity as
13 Navajo County Recorder; F. ANN
14 RODRIGUEZ, in her official capacity as
15 Pima County Recorder; VIRGINIA ROSS, in
16 her official capacity as Pinal County
17 Recorder; SUZANNE SAINZ, in her official
18 capacity as Santa Cruz County Recorder;
19 LESLIE M. HOFFMAN, in her official
20 capacity as Yavapai County Recorder;
21 ROBYN STALLWORTH POUQUETTE, in
22 her official capacity as Yuma County
23 Recorder,

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Defendants.

16 The Attorney General seeks to intervene and obtain relief on behalf of the State because
17 of the importance of the right to vote and have all votes be counted. As the Chief Law
18 Enforcement Officer of the State, the Attorney General is better situated than anyone to
19 understand the importance of ensuring that our electoral processes comply with the law, and that
20 every Arizonan who voted has their vote counted. “Confidence in the integrity of our electoral
21 processes is essential to the functioning of our participatory democracy.” *Purcell v. Gonzalez*,
22 549 U.S. 1, 4 (2006). Long ago the Supreme Court of the United States recognized voting “as a
23 fundamental political right, because [it is] preservative of all rights,” *see Yick Wo v. Hopkins*,
24 118.U.S. 356, 370 (1886). And even in our founding days, citizens like Thomas Paine
25 recognized that “the right of voting for representatives is the primary right by which other rights
26 are protected.” With these foundational principles and concerns in mind, the Attorney General
27 intervenes here on behalf of the State to advance one chief argument: all votes should be
28

1 counted, meaning that all County Recorder Defendants should be ordered to take steps to cure
2 identified signature mismatches on early ballot envelopes that otherwise were validly and
3 properly voted.

4 **I. MOTION TO INTERVENE**

5 Pursuant to Arizona Rule of Civil Procedure (“Rule”) 24(a), and for the reasons set forth
6 herein, the State of Arizona *ex rel.* Mark Brnovich, the Attorney General (the “State”) hereby
7 moves to intervene as a Plaintiff in this action as a matter of right, or, in the alternative, as a
8 permissive intervenor under Rule 24(b). In accordance with Rule 24(c), a proposed Complaint
9 accompanies this motion that sets forth the State’s claims. EXHIBIT A, Proposed Complaint.
10 The State possesses a strong interest in the Court’s interpretation and application of the state
11 laws and rules at issue here. Rule 24(a) requires that a party be permitted to intervene, upon
12 timely application:

13 [W]hen the applicant claims an interest relating to the property or
14 transaction which is the subject of the action and the applicant is so situated that
15 the disposition of the action may as a practical matter impair or impede the
applicant’s ability to protect that interest, unless the applicant’s interest is
adequately represented by existing parties.

16 Rule 24 is a remedial rule that “should be construed liberally in order to assist parties seeking to
17 obtain justice in protecting their rights.” *Dowling v. Stapley*, 221 Ariz. 251, 270 ¶58 (App.
18 2009). Four elements are necessary for a successful motion to intervene under Rule 24(a): “(1)
19 the motion must be timely; (2) the applicant must assert an interest relating to the property or
20 transaction which is the subject of the action; (3) the applicant must show that disposition of the
21 action may impair or impede its ability to protect its interest; and (4) the applicant must show
22 that the other parties would not adequately represent its interests.” *Woodbridge Structured*
23 *Funding, LLC v. Ariz. Lottery*, 235 Ariz. 25, 28 ¶13 (App. 2014).

24 **A. THE STATE IS ENTITLED TO INTERVENTION UNDER RULE 24(a)**

25 ***1. Several Statutory Grounds Establish The State’s Significant Interest Here***

26 This action’s subject matter implicates several statutory bases for the State’s involvement
27 as of right pursuant to Rule 24(a). First, A.R.S. § 41-192(A) establishes the Attorney General
28 “as chief legal officer of the state.” The Arizona Supreme Court has recognized that this

1 statutory power means that the Attorney General “may, like the Governor, go to the courts for
2 the protection of the rights of the people.” *State ex rel. Morrison v. Thomas*, 80 Ariz. 327, 332
3 (1956). Given that this matter concerns how ballots cast in a statewide election are processed
4 and counted, it plainly affects the one of the fundamental rights of Arizonans—the right to vote.
5 *See State v. Key*, 128 Ariz. 419, 421 (App. 1981) (noting the right to vote as “fundamental”).
6 Accordingly, A.R.S. § 41-192(A) is basis enough to allow the Attorney General to intervene as
7 of right.

8 Second, A.R.S. § 41-193(A)(2) empowers the Attorney General to, when he deems
9 necessary, “prosecute and defend any proceeding in a state court other than the supreme court in
10 which the state or an officer thereof is a party or has an interest.”¹ Here, the state generally and
11 at least two state officers (the Secretary of State and the Attorney General) have paramount
12 interests in the outcome of this proceeding, which may direct the future performance of those
13 officers’ duties under state law. *See, e.g.*, A.R.S. § 16-452 (Secretary of State must “proscribe
14 rules” in a manual regarding how to best conduct elections, which the Attorney General must
15 approve); A.R.S. § 16-1021 (Attorney General may enforce A.R.S. Title 16). Given these
16 interests, the claims the Attorney General seeks to make in this matter are authorized by A.R.S.
17 § 41-193(A)(2) and therefore that statute also warrants the Attorney General’s intervention as a
18 matter of right.

19 Third, the State’s claim as set forth in the proposed Complaint and the interests noted
20 previously justify intervention under A.R.S. § 12-1841(A), which requires that “all persons shall
21 be made parties who have or claim any interest which would be affected” by declaratory relief.
22 Plaintiffs’ complaint in this matter seeks declaratory relief that would directly affect the rules for
23 conducting elections in Arizona (and enforcement thereof), that the Secretary of State must
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26 ¹ Although some Arizona case law has interpreted A.R.S. § 41-193(A)(2) as limiting the
27 Attorney General’s power to initiate a proceeding, *see Ariz. State Land Dep’t v. McFate*, 87
28 Ariz. 139 (1960), that case law would be inapposite here, where the Attorney General seeks to
become involved in an already existing matter that plainly concerns matters of significant
statewide interest.

1 proscribe and the Attorney General must approve. *See supra* A.R.S. § 16-452. Accordingly, the
2 Attorney General must be allowed to intervene as of right pursuant to A.R.S. § 12-1841(A).

3 Finally, A.R.S. § 16-542 itself is grounds for intervention as of right under Rule 24(a).
4 As mentioned previously, the Attorney General must approve the rules proscribed by the
5 Secretary of State “to achieve and maintain the maximum degree of correctness, impartiality,
6 uniformity and efficiency on the procedures for early voting and voting, and of producing,
7 distributing, collecting, counting, tabulating and storing ballots.” A.R.S. § 16-542(A).
8 Plaintiffs’ claims in this matter rest in part on those rules, and the Court’s analysis of those
9 claims will be of significant interest to the Attorney General, not just considering the mandate of
10 § 16-542(A), but also given the Attorney General’s responsibility to enforce all of A.R.S. Title
11 16. *See* A.R.S. § 16-1021.

12 ***2. This Motion Is Timely And No Other Party Can Adequately Represent The***
13 ***State’s Interests Here***

14 This motion is timely because it comes two days following Plaintiffs’ complaint being
15 filed and before the Court has heard argument or made any substantive rulings. Timeliness
16 under Rule 24 is “flexible” and the most important consideration “is whether the delay in
17 moving for intervention will prejudice the existing parties to the case.” *Weaver v. Synthes, Ltd.*
18 *(U.S.A.)*, 162 Ariz. 442, 446 (App. 1989). Given that all issues remain pending before the
19 Court, no party will be prejudiced by the State’s intervention, and the Court should therefore
20 consider the motion timely. In addition, no party can adequately represent the State’s interests
21 here because the Attorney General possesses unique statutory responsibilities concerning the
22 laws that form the basis for Plaintiffs’ claims.

23 **B. PERMISSIVE INTERVENTION**

24 Rule 24(b) allows “anyone” to intervene “upon timely application” when “an applicant’s
25 claim or defense and the main action have a question of law or fact in common” and recognizes
26 that the government has a special interest in intervention when “a party’s claim or defense is
27 based on ... any regulation, order, requirement, or agreement issued or made under a statute
28 administered” by that government entity. *Id.* As with Rule 24(a), Rule 24(b) should be

1 construed liberally and “the intervenor-by-permission does not even have to be a person who
2 would have been a proper party at the beginning of the suit.” *Dowling*, 221 Ariz. at 272 ¶ 67
3 (quoting *Bechtel v. Rose*, 150 Ariz. 68, 72 (1986)). Ultimately, whether a party may intervene
4 under Rule 24(b) is left to the adjudicating court’s decision. *See id.* at ¶ 16 (concluding trial
5 court did not abuse its discretion in performing Rule 24(b) analysis).

6 The same reasons proffered for the State's intervention as of right also support allowing it
7 to intervene permissibly. The State's interests in preserving the equal rights of all its citizens
8 and in ensuring the uniform and fair nature of its elections are significant public interests that
9 warrant the State's involvement. *See City of Tucson v. Pima Cnty.*, 199 Ariz. 509, 515, (App.
10 2001) (finding government intervention appropriate in a case involving equal protection and the
11 right to vote). These protectable interests are directly related to the questions of law in this case
12 as to the appropriate means of carrying out ballot counting procedures and enforcing state
13 election law. The State also has an interest in maintaining the legitimacy of its elections, which
14 will be directly injured if the voting rights of certain citizens are abridged due to unequal
15 treatment based on the county in which they live.

16 Because permissive intervention is subject to the Court's discretion, the Court should
17 allow the State to intervene because the State, through the Attorney General, has unique interests
18 and expertise in the legal issues raised by this action, which go to the very heart of fundamental
19 state responsibilities and processes under Arizona law. The State's perspective, experience, and
20 statutorily-established function, as well as its ability to represent the collective interest of all
21 Arizona citizens would be helpful to the Court. Given these and ample other reasons to allow
22 the State's intervention, the Court should not hesitate to exercise its discretion in allowing the
23 State to intervene in this matter.

24 **II. APPLICATION FOR TEMPORARY RESTRAINING ORDER AND**
25 **PRELIMINARY INJUNCTION**

26 Pursuant to Rule 65(a), the State hereby moves for a temporary restraining order and a
27 preliminary injunction against the County Recorder defendants. For all early ballots that were
28 received by the County Recorders either through mail or being dropped off prior to 7:00 p.m. on

1 election day and that have a signature on the affidavit on the envelope, the County Recorders
2 must make at least one effort to cure any signature deemed insufficient by attempting to call the
3 voter at the telephone number provided on the envelope or if no phone number is provided, the
4 phone number on file for that voter to verify the validity of the signature and the ballot. Upon
5 successful verification of the signature and ballot, the County Recorder must deliver the ballot
6 “to the early election boards for processing” in time to be included in the canvas. A.R.S. § 16-
7 551(C). The elements for a temporary restraining order and preliminary injunction are met. *See*
8 *Shoen v. Shoen*, 167 Ariz. 58, 63 (App. 1990).

9 **A. All Votes Should Be Counted, Meaning All County Recorders Should Take Steps To**
10 **Cure Identified Signature Mismatches On Early Ballot Envelopes**

11 Core equal protection principles compel the conclusion that in the circumstances of this
12 election all county recorders should be taking affirmative steps to cure identified signature
13 mismatches on early ballot envelopes by making at least one telephonic effort to contact each
14 voter with an identified signature deficiency on a ballot that otherwise was validly and properly
15 voted.

16 ***1. State And Federal Equal Protection Compel Equal Treatment Of Arizona Early***
17 ***Ballot Envelopes, Including Steps Taken To Cure Identified Signature Mismatches***

18 Federal equal protection requirements compel that when presented with standardized
19 Arizona early ballot envelopes, the Recorders in all counties shall take equal steps to cure
20 identified signature mismatches on such ballots when they otherwise were validly and properly
21 voted. “All agree that the right to vote is ‘the protected right, implicit in our constitutional
22 system, to participate in state elections on an equal basis with other qualified voters.’” *Arizona*
23 *Minority Coal. for Fair Redistricting v. Arizona Indep. Redistricting Comm’n*, 211 Ariz. 337,
24 345–46 (App. 2005) (quoting *San Antonio Sch. Dist. v. Rodriguez*, 411 U.S. 1, 35 n. 78 (1973)).
25 “Having once granted the right to vote on equal terms, the State may not, by later arbitrary and
26 disparate treatment, value one person’s vote over that of another.” *Bush v. Gore*, 531 U.S. 98,
27 104–05 (2000); *see also League of Women Voters v. Brunner*, 548 F.3d 466, 477 (6th Cir. 2008)
28 (“At a minimum, . . . equal protection requires ‘nonarbitrary treatment of voters.’” (quoting

1 *Bush*, 531 U.S. at 105)). Equal protection under Arizona law similarly requires that all votes be
2 treated equally. *See Chavez v. Brewer*, 222 Ariz. 309, 319 (App. 2009) (“Elections are equal
3 when the vote of each voter is equal in its influence upon the result to the vote of every other
4 elector-where each ballot is as effective as every other ballot” (quoting *Moran v. Bowley*, 347
5 Ill. 148, 179 N.E. 526, 531 (1932)); Ariz. Const. art. II, §§ 13, 21.

6 ***2. Ballots Are Not Being Treated Equally Now, And The Appropriate Equal***
7 ***Protection Remedy Is A Mandate That All County Recorders Take Affirmative***
8 ***Steps To Cure Identified Signature Mismatches On The State’s Standardized Early***
9 ***Ballot Envelopes***

10 At present, ballots in Arizona’s different counties are being treated unequally because
11 certain County Recorders are taking affirmative steps to cure identified signature mismatches on
12 early ballot envelopes, while other County Recorders faced with the same identified signature
13 deficiency issues on other ballots are taking no such steps. That is a patent equal protection
14 problem given the standardized nature of the ballots and envelopes at issue and the unequal
15 approach to reviewing and counting those ballots.

16 Given that certain county recorders are taking affirmative steps to cure identified
17 signature mismatches on early ballot envelopes, equal protection mandates that all county
18 recorders do so too when faced with the same standardized ballot envelopes. “Once the
19 franchise is granted to the electorate, lines may not be drawn which are inconsistent with the
20 Equal Protection Clause of the Fourteenth Amendment.” *Harper v. Virginia State Bd. of*
21 *Elections*, 383 U.S. 663, 665 (1966). ““The right to vote includes the right to have one’s vote
22 counted on equal terms with others.”” *Hunter v. Hamilton Cty. Bd. of Elections*, 635 F.3d 219,
23 234 (6th Cir. 2011); *see also Bush*, 531 U.S. at 104; *Dunn v. Blumstein*, 405 U.S. 330, 336
24 (1972); *Reynolds v. Sims*, 377 U.S. 533, 567–68 (1964); *Wesberry v. Sanders*, 376 U.S. 1, 7
25 (1964); *Gray v. Sanders*, 372 U.S. 368, 380 (1963); *United States v. Classic*, 313 U.S. 299, 315
26 (1941); *United States v. Mosley*, 238 U.S. 383, 386 (1915).

1 **3. State and Federal Due Process Compels The Same Result**

2 Under the Due Process clause of the Fourteenth Amendment (and substantially the same
3 under Article 2, Section 4 of the Arizona Constitution), no state may “deprive any person of life,
4 liberty, or property, without due process of law.” As noted above, the right to vote is a
5 “protected right, implicit in our constitutional system.” *Arizona Minority Coal. for Fair*
6 *Redistricting v. Arizona Indep. Redistricting Commn*, 211 Ariz. 337, 345–46 (App. 2005)
7 (quoting *San Antonio Sch. Dist. v. Rodriguez*, 411 U.S. 1, 35 n. 78 (1973)). When the State
8 burdens a constitutional right, as County Recorders are doing here by failing to give voters the
9 opportunity to validate their early ballots, the Court must weigh “the character and magnitude of
10 the asserted injury to the rights of the protected by the First and Fourteenth Amendments”
11 against “the precise interests put forward by the State as justifications for the burden imposed by
12 its rule.” *Burdick v. Takushi*, 504 U.S. 428, 434 (1992).

13 In this election, 13 of Arizona’s 15 counties are prepared to throw out thousands of
14 ballots, effectively disenfranchising those voters, without giving individuals the chance to
15 rehabilitate their uncounted early ballots, and without providing a compelling government
16 interest for failing to contact voters. Meanwhile, voters in the two remaining counties are being
17 given an opportunity to validate their ballots. Under these circumstances, Arizona voters in 13
18 counties are being deprived of their constitutional right and suffering the harsh penalty of
19 disenfranchisement simply because of their zip code. By subjecting voters to disparate
20 treatment in the exercise of the electoral franchise without an appropriately compelling
21 government interest, County Recorders are denying Arizona voters an equal right to vote in
22 violation of the Due Process Clause. Additionally, by not providing notice prior to disregarding
23 a signed and timely received early ballot, the County Recorders are violating voters’ procedural
24 due process rights.

25 **B. The Other Factors For A Preliminary Injunction Are Met**

26 For the reasons set forth in Plaintiffs’ application, which is incorporated herein by
27 reference, the other elements for a temporary restraining order and preliminary injunction are
28 met here.

1 **CONCLUSION**

2 For the foregoing reasons, the Court should grant the State’s motion to intervene and
3 grant the application for a temporary restraining order and preliminary injunction.

4 RESPECTFULLY SUBMITTED: November 9, 2018.

5 MARK BRNOVICH,
6 ATTORNEY GENERAL

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1 Document electronically transmitted
2 to the Clerk of the Court for filing, using
3 AZTurboCourt, this 9th day of November, 2018.

4 Copy of the foregoing e-mailed
5 on November 9, 2018 to:

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