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16 UNITED STATES DISTRICT COURT

17 FOR THE DISTRICT OF ARIZONA

18	Manuel de Jesus Ortega Melendres, et al.,)	No. CV-07-2513-PHX-GMS
19)	
20	Plaintiffs,)	
21)	
22	v.)	SUPPLEMENTAL MOTION TO
23)	VACATE HEARING AND REQUEST
24)	FOR ENTRY OF JUDGMENT
25	Joseph M. Arpaio, et al.,)	
26)	
27	Defendants.)	(Request for Expedited Ruling)
28)	

29 Defendants Joseph Arpaio and the Maricopa County Sheriff's Office, and
30 identified non-party Chief Deputy Gerard Sheridan hereby submit Amended Exhibits A
31 and B to the Expedited Motion to Vacate Hearing and Request for Entry of Judgment
32 (Doc. 948) in light of comments made by the Court at the status conference held on
33 March 20, 2015. Defendants have attached to this supplemental motion and the revised
34 exhibits.

1 In submitting this supplemental motion, Defendants make the following
2 comments:

- 3 1. Sheriff Arpaio and Chief Sheridan will personally make a contribution of
4 a total of \$100,000 to a civil rights organization approved by the Court, as
5 described at 2(c) of Exhibit B. The funds used for such contribution will
6 not come from any other source, such as a legal defense fund.
7
8 2. Although all parties who are the subject of the Order to Show Cause have
9 not consented to a finding of civil contempt, Defendants urge the Court to
10 resolve the entire contempt proceeding through the entry of an order
11 finding Sheriff Arpaio, MCSO and Chief Deputy Sheridan in civil
12 contempt, and imposing the remedies identified in Exhibit B.
13
14 3. We shared the Amended Exhibits with Plaintiffs who have declined our
15 request to join Defendants' motion for entry of judgment. Nevertheless,
16 in light of the stipulations and remedies offered, we request that the Court
17 enter judgment against Sheriff Arpaio, MCSO, and Chief Deputy
18 Sheridan for civil contempt and vacate the hearing scheduled for April
21-24.

19 Accordingly, for the reasons stated in the original motion [Doc. 948] and in this
20 supplemental motion, we request that the Court vacate the contempt hearing and enter
21 judgment finding Sheriff Arpaio, MCSO and Chief Deputy Sheridan in civil contempt
22 of court.

23
24 RESPECTFULLY SUBMITTED April 10, 2015.

25 IAFRATE & ASSOCIATES

26
27 By: s/Michele M. Iafrate

28 Michele M. Iafrate

Attorneys for Sheriff Joseph M. Arpaio
and Maricopa County Sheriff's Office

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CERTIFICATE OF SERVICE

I hereby certify that on April 10, 2015, I electronically transmitted the attached document using the CM/ECF system for filing, and which will be sent electronically to all registered participants as identified on the Notice of Electronic Filing, and paper copies will be sent to those indicated as non-registered participants.

s:/Tracy Cryan