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for Plaintiffs listed on next page)*

Manuel de Jesus Ortega Melendres,
et al.,

V.

Defendants.

**NOTICE OF LODGING UNDER
SEAL OF EXHIBITS B-F TO
DECLARATION OF
CECILLIA WANG**

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1 Pursuant to Local Rule 5.6, Plaintiffs hereby file this notice that on this date, they
2 have lodged under seal Exhibits B-F to the Declaration of Cecillia Wang in support of
3 Plaintiffs' Response in Opposition to the recusal motion filed by Sheriff Arpaio and
4 Chief Deputy Sheridan.

5 The foregoing exhibits are documents that were produced by Defendant Sheriff
6 Arpaio to the Plaintiffs on May 6, 2015, on an attorneys'-eyes-only basis.

7 Plaintiffs take the position that the foregoing documents should not be sealed
8 under the "compelling reasons" standard set forth in *Kamakana v. City and Cnty. of*
9 *Honolulu*, 447 F.3d 1172, 1179 (9th Cir. 2006). Nothing on the face of these documents,
10 or in the record in this litigation, indicates that there are grounds to overcome the strong
11 presumption in favor of public filing of court records. However, because the documents
12 were produced to Plaintiffs on an attorneys'-eyes-only basis, Plaintiffs have lodged the
13 exhibits under seal. Plaintiffs are also filing herewith a redacted copy of the Declaration
14 of Cecillia Wang.

15 Plaintiffs have met and conferred with counsel for the Defendants, who indicate
16 that they do not object to the filing of the foregoing exhibits under seal. A certification
17 by undersigned counsel pursuant to Local Rule Civ. 5.6(d) is attached hereto.

18
19 RESPECTFULLY SUBMITTED this 12th day of June, 2015.

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21 By: /s/ Cecillia D. Wang

22 Cecillia D. Wang (*Pro Hac Vice*)
23 Andre I. Segura (*Pro Hac Vice*)
24 ACLU Foundation
Immigrants' Rights Project

25 Daniel Pochoda
26 ACLU Foundation of Arizona

27 Anne Lai (*Pro Hac Vice*)
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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Manuel de Jesus Ortega Melendres,
et al.,

Plaintiffs,

v.

Joseph M. Arpaio, *et al.*,

Defendants.

CV-07-2513-PHX-GMS

**CERTIFICATION OF COUNSEL
PURSUANT TO LOCAL RULE 5.6**

I, Cecillia D. Wang, declare as follows:

1. I am an attorney admitted to practice in California and New York and in numerous federal courts and have been admitted *pro hac vice* to represent the Plaintiffs in this matter.

2. I make this certification pursuant to Local Rule Civ. 5.6(d), in support of the accompanying Notice of Lodging Under Seal of Exhibits B-F to the Declaration of Cecillia Wang, all filed in support of Plaintiffs' Response in Opposition to Sheriff Arpaio and Chief Deputy Sheridan's motion to recuse the Court.

3. I have met and conferred with John Masterson, counsel for Defendant Arpaio, and Richard Walker, counsel for Defendant Maricopa County, informing them of Plaintiffs' intent to submit the five documents that were produced by Defendant Arpaio to the Plaintiffs, as exhibits in support of Plaintiffs' response to the pending recusal motion. I proposed that the parties stipulate to the filing under seal of the documents, pursuant to Local Rule Civ. 5.6(d). Mr. Masterson and Mr. Walker stated that they do not object to the filing of the exhibits under seal. However, because Plaintiffs wished to

1 indicate in any stipulation that they do not believe there is a basis to seal the
2 documents, Defendants' counsel declined to join in a stipulation.

3 I hereby declare that the foregoing is true and correct under penalty of
4 perjury pursuant to 28 U.S.C. § 1746.

5 Executed at San Francisco, California this 12th day of June, 2015.

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7 /s/ Cecillia D. Wang
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CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2015, I electronically transmitted the attached document to the Clerk's office using the CM/ECF System for filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail as indicated on the Notice of Electronic Filing.

Dated this 12th day of June, 2015.

/s/ Cecillia D. Wang