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

Manuel de Jesus Ortega Melendres, ) CV-07-2513-PHX-GMS  
*et al.*, )

Plaintiffs, )

v. )

Joseph M. Arpaio, *et al.*, )

Defendants. )

**DEFENDANTS' STATEMENT RE  
PROPOSED DEADLINES FOR  
DOCUMENT PRODUCTION**

Pursuant to the Court's order of July 20, 2015 (Doc. 1179), counsel for the  
Plaintiffs and for Defendants Joseph Arpaio and Maricopa County met and conferred  
regarding the schedule for Defendants' production of documents in advance of the  
continuation of a contempt hearing on September 22, 2015.

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Defendants will produce the following documents by the dates indicated below:

1. Emails of specified Maricopa County Sheriff's Office (MCSO) personnel from archived .pst files in the possession of Maricopa County will be produced on or before August 21, 2015.

2. The current version of the MCSO spreadsheet tracking the review of video recordings of MCSO traffic stops, including information about recordings flagged for lieutenant-level review, will be produced on or before July 31, 2015.

3. All recordings of press interviews and press conferences by Sheriff Arpaio will be produced on or before August 7.

4. Raw data from MCSO's computer-aided dispatch (CAD) system for traffic stops conducted from December 23, 2011 to the present will be produced on or before August 7.

5. All documents relating to violations of the Court's preliminary injunction order of December 23, 2011, by MCSO personnel not assigned to the Human Smuggling Unit will be produced on or before August 14.

6. All documents relating to detentions of members of the Plaintiff class during operations at work sites or during execution of warrants in connection with employment-related violations will be produced on or before August 14.

7. All documents relating to internal affairs investigations IA 2014-542 and IA 2014-543 will be produced on or before August 7. This production will include all correspondence between independent investigator Donald Vogel and MCSO personnel and drafts, working papers and other documents relating to the foregoing investigations in the files of MCSO personnel or Mr. Vogel.

1           8.       Documents relating to approximately 20 other internal affairs  
2 investigations including 2 that were initially assigned to Mr. Vogel, but completed by  
3 MCSO personnel, will be produced on or before August 7.

4           9.       Documents relating to internal affairs investigations from 2008 forward,  
5 relating to allegations of discrimination against or illegal detentions of members of the  
6 Plaintiff class, will be produced on or before August 21. Plaintiffs agree to rewrite their  
7 request to limit the overbroad scope of this request, as discussed with the Court in the  
8 July 20, 2015 status conference.  
9

10           10.     Documents in the possession of former defense counsel Tim Casey and  
11 responsive to Plaintiffs' subpoena were reviewed by Defendants' current counsel and  
12 were returned to Mr. Casey's counsel for production, along with a log identifying any  
13 documents withheld on privilege grounds.  
14

15  
16           RESPECTFULLY SUBMITTED this 29th day of July, 2015.  
17  
18

19                           By: s/Michele M. Iafrate  
20                           Michele M. Iafrate  
21                           Iafrate & Associates  
22                           Attorney for Defendants Joseph M.  
23                           Arpaio and Maricopa County Sheriff's  
24                           Office

25                           By: s/Richard K. Walker (w/permission)  
26                           Richard K. Walker  
27                           Walker & Peskind  
28                           Attorney for Defendant Maricopa County,  
                              Arizona

**CERTIFICATE OF SERVICE**

I hereby certify that on July 29, 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 29th day of July, 2015.

s/Jill Laforvara