

John T. Masterson, Bar #007447
Joseph J. Popolizio, Bar #017434
Justin M. Ackerman, Bar #030726
JONES, SKELTON & HOCHULI, P.L.C.
2901 North Central Avenue, Suite 800
Phoenix, Arizona 85012
Telephone: (602) 263-1700
Fax: (602) 200-7827
jmasterson@jshfirm.com
jpopolizio@jshfirm.com
jackerman@jshfirm.com

and

Michele M. Iafrate, Bar #015115
Iafrate & Associates
649 North Second Avenue
Phoenix, Arizona 85003
Tel: 602-234-9775
miafrate@iafratelaw.com
Attorneys for Defendant Joseph M. Arpaio in his official
capacity as Sheriff of Maricopa County, AZ

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Manuel de Jesus Ortega Melendres, et al.,

Plaintiffs,

v.

Joseph M. Arpaio, et al.,

Defendants.

NO. CV 07-02513-PHX-GMS

**Defendant Arpaio's Response to
United States' Motion to Intervene
and Memorandum in Support**

Defendant Arpaio responds to the United States' Motion to Intervene and
does not object to such intervention provided that, as asserted by United States,

The United States does not seek to expand the scope of this
litigation. The United States does not seek to re-litigate any of the
merits of plaintiffs' claims, or to introduce new claims into the suit.
The United States seeks only to participate in the ongoing remedial
stages of this lawsuit.

[Doc. 1177 at p.2].

Based upon the above assertions by the United States, that the United States

1 will not raise new claims or seek new remedies, including claims or remedies that were, or
2 could have been, made in *United States of America v. Maricopa County, Arizona et al.*,
3 *Case No. CV 12-00981-PHX-ROS*, Defendant Arpaio does not object to intervention.

4 Although Defendant Arpaio does not object to the intervention sought by the
5 United States as set forth above, he does object and expressly denies the unnecessary and
6 inflammatory language and other unsupported allegations set forth in the United States'
7 Memorandum including, but not limited to, unsupported assertions as to "Defendant
8 Arpaio's hostility to the remedial order in this case" and completely speculative and
9 unfounded allegations that the "consequences of his defiance of the order will be closely
10 followed by not only the general public, but by law enforcement agencies through the
11 country." These statements and others contained in the United States' memorandum are
12 unnecessary to the motion, unsupported, inflammatory, and are expressly denied by
13 Defendant Arpaio.

1 DATED this 6th day of August, 2015.

2 JONES, SKELTON & HOCHULI, P.L.C.

3
4 By /s/ John T. Masterson

5 John T. Masterson
6 Joseph J. Popolizio
7 Justin M. Ackerman
8 2901 North Central Avenue, Suite 800
9 Phoenix, Arizona 85012
10 Attorneys for Defendant Joseph M. Arpaio
11 and the Maricopa County Sheriff's Office

12 DATED this 6th day of August, 2015.

13 IAFRATE & ASSOCIATES

14 By /s/ John T. Masterson (w/permission from)

15 Michele M. Iafrate
16 649 North Second Avenue
17 Phoenix, Arizona 85003
18 Attorneys for Defendant Joseph M. Arpaio
19 in his official capacity as Sheriff of
20 Maricopa County
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CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of August, 2015, I caused the foregoing document to be filed electronically with the Clerk of Court through the CM/ECF System for filing; and served on counsel of record via the Court's CM/ECF system.

/s/ Ginger Stahly