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

11 **MANUEL de JESUS ORTEGA**
12 **MELENDRES, et al.,**

13 Plaintiff(s)

14 v.

15 **JOSEPH M. ARPAIO, et al.,**

16 Defendant(s).

Case No.: CV-07-2513-PHX-GMS

NON-PARTY TIMOTHY J.
CASEY'S NOTICE OF POSITION
REGARDING HIS DEPOSITION

17 Non-party Timothy J. Casey, by and through his undersigned specially appearing
18 ethics counsel, submits this Notice of Position Regarding his Deposition.

19 Tim Casey is former counsel to Defendants Sheriff Joseph M. Arpaio and the
20 MCSO. Plaintiffs have subpoenaed Mr. Casey to attend his deposition on September
21 16, 2015.

22 Mr. Casey has reviewed the transcript of the Status Conference held on August
23 28, 2015. Pursuant to the Court's discussion during the Status Conference (Transcript
24 of Proceedings on 08/28/15 at 21:3 to 22:12), Mr. Casey requests the Court's attendance
25 at his September 16, 2015 deposition to allow for rulings on privilege and
26

1 confidentiality objections and instructions to him as a witness. Mr Casey urges that this
2 will promote the efficient taking of the deposition and its completion on a single date.
3 Mr. Casey has no objection to the deposition taking place in the federal courthouse or
4
5 any other location convenient to the Court.

6 **RESPECTFULLY SUBMITTED** this 3rd day of September, 2015

7 ADAMS & CLARK, P.C.
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9 /s/ Karen Clark

10 Karen Clark

11 Attorney for Timothy J. Casey
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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of September, 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.

By: /s/ Beverley Thomas