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7 8	Attorneys for Plaintiffs (Additional attorne for Plaintiffs listed on next page)	rys
9	UNITED STATES	S DISTRICT COURT
10	DISTRICT	OF ARIZONA
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12		
13	Manuel de Jesus Ortega Melendres, et al.,	No.: CV 07-2513-PHX-GMS
1415	Plaintiffs,	DECLARATION OF KEVIN HICKEY IN SUPPORT OF
16	V.	PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT
17	Joseph M. Arpaio, et al.,	
18	Defendants	
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DECLARATION OF KEVIN HICKEY IN SUPPORT OF PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT No.: CV 07-2513-PHX-GMS

1	Additional Attorneys for Plaintiffs:
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DECLARATION OF KEVIN HICKEY IN SUPPORT OF PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT No.: CV 07-2513-PHX-GMS

I, Kevin J. Hickey, declare:

- 1. I am attorney with Covington & Burling LLP, counsel for Plaintiffs Manuel de Jesus Ortega Melendres, Jessika Quitugua Rodriguez, David Rodriguez, Velia Meraz, Manuel Nieto, Jr. and Somos America. I make this Declaration in support of Plaintiffs' Motion for Partial Summary Judgment. My statements about various litigation documents in the case are based on my personal knowledge or my review of the files that Covington & Burling has obtained from its predecessor counsel in this case. Certain of the transcripts and other documents were generated or produced prior to Covington & Burling and my becoming involved in the case, and my statements below about the truth and correctness of the copies of these documents thus refer to the files of predecessor counsel.
- 2. The last names and addresses of the non-MCSO individuals who have communicated with the MCSO or Sheriff Arpaio have been redacted from the Exhibits, including the deposition excerpts. This has been done in order to avoid directing unnecessary attention to those individuals. Generally, the MCSO did not redact such information from the materials it produced in discovery to Plaintiffs. If Defendants object to the Plaintiffs' redactions, or if the Court believes that the redacted information is necessary for the efficient and correct adjudication of the issues before it, Plaintiffs are willing to provide unredacted versions of the documents and deposition excerpts.
- 3. Attached hereto as Exhibit 1 is a true and correct copy of Excerpts of the transcript of the deposition of Ramon Charley Armendariz, taken on November 24, 2009.
- 4. Attached hereto as Exhibit 2 is a true and correct copy of Excerpts of the transcript of the deposition of Ramon Charley Armendariz, taken on November 8, 2010.
- 5. Attached hereto as Exhibit 3 is a true and correct copy of Exhibit 6 to the deposition of Ramon Charley Armendariz, taken on November 8, 2010.

1	20. Attached hereto as Exhibit 18 is a true and correct copy of Exhibit 11
2	to the deposition of Joseph Arpaio, taken on November 16, 2010.
3	21. Attached hereto as Exhibit 19 is a true and correct copy of Exhibit 12
4	to the deposition of Joseph Arpaio, taken on November 16, 2010.
5	22. Attached hereto as Exhibit 20 is a true and correct copy of Exhibit 13
6	to the deposition of Joseph Arpaio, taken on November 16, 2010.
7	23. Attached hereto as Exhibit 21 is a true and correct copy of Exhibit 14
8	to the deposition of Joseph Arpaio, taken on November 16, 2010.
9	24. Attached hereto as Exhibit 22 is a true and correct copy of Exhibit 17
10	to the deposition of Joseph Arpaio, taken on November 16, 2010.
11	25. Attached hereto as Exhibit 23 is a true and correct copy of Exhibit 18
12	to the deposition of Joseph Arpaio, taken on November 16, 2010.
13	26. Attached hereto as Exhibit 24 is a true and correct copy of Exhibit 19
14	to the deposition of Joseph Arpaio, taken on November 16, 2010.
15	27. Attached hereto as Exhibit 25 is a true and correct copy of Exhibit 20
16	to the deposition of Joseph Arpaio, taken on November 16, 2010.
17	28. Attached hereto as Exhibit 26 is a true and correct copy of Exhibit 21
18	to the deposition of Joseph Arpaio, taken on November 16, 2010.
19	29. Attached hereto as Exhibit 27 is a true and correct copy of Exhibit 22
20	to the deposition of Joseph Arpaio, taken on November 16, 2010.
21	30. Attached hereto as Exhibit 28 is a true and correct copy of Exhibit 23
22	to the deposition of Joseph Arpaio, taken on November 16, 2010.
23	31. Attached hereto as Exhibit 29 is a true and correct copy of Exhibit 24
24	to the deposition of Joseph Arpaio, taken on November 16, 2010.
25	32. Attached hereto as Exhibit 30 is a true and correct copy of Exhibit 25
26	to the deposition of Joseph Arpaio, taken on November 16, 2010.
27	33. Attached hereto as Exhibit 31 is a true and correct copy of Exhibit 26
28	to the deposition of Joseph Arpaio, taken on November 16, 2010.

1	34. Attached hereto as Exhibit 32 is a true and correct copy of Exhibit 27
2	to the deposition of Joseph Arpaio, taken on November 16, 2010.
3	35. Attached hereto as Exhibit 33 is a true and correct copy of Exhibit 28
4	to the deposition of Joseph Arpaio, taken on November 16, 2010.
5	36. Attached hereto as Exhibit 34 is a true and correct copy of Exhibit 30
6	to the deposition of Joseph Arpaio, taken on November 16, 2010.
7	37. Attached hereto as Exhibit 35 is a true and correct copy of Exhibit 34
8	to the deposition of Joseph Arpaio, taken on November 16, 2010.
9	38. Attached hereto as Exhibit 36 is a true and correct copy of Exhibit 42
10	to the deposition of Joseph Arpaio, taken on November 16, 2010.
11	39. Attached hereto as Exhibit 37 is a true and correct copy of Exhibit 43
12	to the deposition of Joseph Arpaio, taken on November 16, 2010.
13	40. Attached hereto as Exhibit 38 is a true and correct copy of Excerpts of
14	the transcript of the deposition of Douglas W. Beeks, taken on October 22, 2009.
15	41. Attached hereto as Exhibit 39 is a true and correct copy of Excerpts of
16	the transcript of the deposition of Steven Camarota, taken on March 22, 2011.
17	42. Attached hereto as Exhibit 40 is a true and correct copy of Excerpts of
18	the transcript of the deposition of Bennie R. Click, taken on March 18, 2011.
19	43. Attached hereto as Exhibit 41 is a true and correct copy of Exhibit 6 to
20	the deposition of Bennie R. Click, taken on March 18, 2011.
21	44. Attached hereto as Exhibit 42 is a true and correct copy of Exhibit 9 to
22	the deposition of Bennie R. Click, taken on March 18, 2011.
23	45. Attached hereto as Exhibit 43 is a true and correct copy of Exhibit 25
24	to the deposition of Bennie R. Click taken on March 18, 2011.
25	46. Attached hereto as Exhibit 44 is a true and correct copy of Excerpts of
26	the transcript of the deposition of Louis DiPietro, taken on October 21, 2009.
27	47. Attached hereto as Exhibit 45 is a true and correct copy of Exhibit 1 to
28	the deposition of Louis DiPietro, taken on October 21, 2009.

1	48. Attached hereto as Exhibit 46 is a true and correct copy of Excerpts of
2	the transcript of the deposition of Lydia Guzman, taken on December 2, 2009.
3	49. Attached hereto as Exhibit 47 is a true and correct copy of Excerpts of
4	the transcript of the deposition of David Anthony Hendershott, taken on February 12,
5	2010.
6	50. Attached hereto as Exhibit 48 is a true and correct copy of Excerpts of
7	the transcript of the deposition of Jason Douglas Kidd, taken on October 1, 2010.
8	(Counsel for ICE has indicated that the transcript is not confidential save certain
9	redactions that have been made to the transcript by consent of the parties. (See Notice to
10	Court concerning Protective Order Regarding Depositions of Jason Kidd and Alonzo
11	Pena, Oct. 29, 2010, Dkt. No. 380.))
12	51. Attached hereto as Exhibit 49 is a true and correct copy of Excerpts of
13	the transcript of the deposition of Michael Dean Kikes, taken on February 15, 2010.
14	52. Attached hereto as Exhibit 50 is a true and correct copy of Excerpts of
15	the transcript of the deposition of Manuel Joseph Madrid, taken on October 27, 2009.
16	53. Attached hereto as Exhibit 51 is a true and correct copy of Excerpts of
17	the transcript of the deposition of Manuel Joseph Madrid, taken on October 20, 2010.
18	54. Attached hereto as Exhibit 52 is a true and correct copy of Exhibit 5 to
19	the deposition of Manuel Joseph Madrid, taken on October 20, 2010.
20	55. Attached hereto as Exhibit 53 is a true and correct copy of Excerpts of
21	the transcript of the deposition of Manuel de Jesus Ortega Melendres, taken on October
22	8, 2009.
23	56. Attached hereto as Exhibit 54 is a true and correct copy of Excerpts of
24	the transcript of the deposition of Velia Meraz, taken on October 8, 2009.
25	57. Attached hereto as Exhibit 55 is a true and correct copy of Excerpts of
26	the transcript of the deposition of Manuel Nieto, Jr., taken on October 8, 2009.
27	58. Attached hereto as Exhibit 56 is a true and correct copy of Excerpts of
28	the transcript of the deposition of Brett Palmer, taken on October 23, 2009.

1	59. Attached hereto as Exhibit 57 is a true and correct copy of Exhibit 1 to
2	the deposition of Brett Palmer, taken on October 23, 2009.
3	60. Attached hereto as Exhibit 58 is a true and correct copy of Exhibit 2 to
4	the deposition of Brett Palmer, taken on October 23, 2009.
5	61. Attached hereto as Exhibit 59 is a true and correct copy of Exhibit 3 to
6	the deposition of Brett Palmer, taken on October 23, 2009.
7	62. Attached hereto as Exhibit 60 is a true and correct copy of Exhibit 4 to
8	the deposition of Brett Palmer, taken on October 23, 2009.
9	63. Attached hereto as Exhibit 61 is a true and correct copy of Excerpts of
10	the transcript of the deposition of Brett Palmer, taken on November 9, 2010.
11	64. Attached hereto as Exhibit 62 is a true and correct copy of Exhibit 5 to
12	the deposition of Brett Palmer, taken on November 9, 2010.
13	65. Attached hereto as Exhibit 63 is a true and correct copy of Exhibit 6 to
14	the deposition of Brett Palmer, taken on November 9, 2010.
15	66. Attached hereto as Exhibit 64 is a true and correct copy of Exhibit 7 to
16	the deposition of Brett Palmer, taken on November 9, 2010.
17	67. Attached hereto as Exhibit 65 is a true and correct copy of Exhibit 15
18	to the deposition of Brett Palmer, taken on November 9, 2010.
19	68. Attached hereto as Exhibit 66 is a true and correct copy of Excerpts of
20	the transcript of the deposition of Alonzo Rafael Pena, taken on September 30, 2010.
21	(Counsel for ICE has indicated that the transcript is not confidential save certain
22	redactions that have been made to the transcript by consent of the parties. (See Notice to
23	Court concerning Protective Order Regarding Depositions of Jason Kidd and Alonzo
24	Pena, Oct. 29, 2010, Dkt. No. 380.))
25	69. Attached hereto as Exhibit 67 is a true and correct copy of Excerpts of
26	the transcript of the deposition of Carlos Rangel, taken on October 20, 2009.
27	70. Attached hereto as Exhibit 68 is a true and correct copy of Exhibit 2 to
28	the deposition of Carlos Rangel, taken on October 20, 2009.

1	71. Attached hereto as Exhibit 69 is a true and correct copy of Excerpts of
2	the transcript of the deposition of Carlos Rangel, taken on November 8, 2010.
3	72. Attached hereto as Exhibit 70 is a true and correct copy of Exhibit 5 to
4	the deposition of Carlos Rangel, taken on November 8, 2010.
5	73. Attached hereto as Exhibit 71 is a true and correct copy of Excerpts of
6	the transcript of the deposition of Matthew Lucas Ratcliffe, taken on October 15, 2009.
7	74. Attached hereto as Exhibit 72 is a true and correct copy of Exhibit 4 to
8	the deposition of Matthew Lucas Ratcliffe, taken on October 15, 2009.
9	75. Attached hereto as Exhibit 73 is a true and correct copy of Exhibit 6 to
10	the deposition of Matthew Lucas Ratcliffe, taken on October 15, 2009.
11	76. Attached hereto as Exhibit 74 is a true and correct copy of Excerpts of
12	the transcript of the deposition of David L. Rodriquez, taken on October 2, 2009.
13	77. Attached hereto as Exhibit 75 is a true and correct copy of Excerpts of
14	the transcript of the deposition of Jessika Rodriquez, taken on October 2, 2009.
15	78. Attached hereto as Exhibit 76 is a true and correct copy of Excerpts of
16	the transcript of the deposition of Brian L. Sands, taken on December 14, 2009.
17	79. Attached hereto as Exhibit 77 is a true and correct copy of Exhibit 8 to
18	the deposition of Brian L. Sands, taken on December 14, 2009.
19	80. Attached hereto as Exhibit 78 is a true and correct copy of Excerpts of
20	the transcript of the deposition of Brian L. Sands, taken on November 15, 2010.
21	81. Attached hereto as Exhibit 79 is a true and correct copy of Exhibit 3 to
22	the deposition of Brian L. Sands, taken on November 15, 2010.
23	82. Attached hereto as Exhibit 80 is a true and correct copy of Exhibit 9 to
24	the deposition of Brian L. Sands, taken on November 15, 2010.
25	83. Attached hereto as Exhibit 81 is a true and correct copy of Exhibit 11
26	to the deposition of Brian L. Sands, taken on November 15, 2010.
27	84. Attached hereto as Exhibit 82 is a true and correct copy of Exhibit 13
20	to the denosition of Brian I. Sands, taken on November 15, 2010

1	85. Attached hereto as Exhibit 83 is a true and correct copy of Exhibit 15
2	to the deposition of Brian L. Sands, taken on November 15, 2010.
3	86. Attached hereto as Exhibit 84 is a true and correct copy of Exhibit 22
4	to the deposition of Brian L. Sands, taken on November 15, 2010.
5	87. Attached hereto as Exhibit 85 is a true and correct copy of Exhibit 23
6	to the deposition of Brian L. Sands, taken on November 15, 2010.
7	88. Attached hereto as Exhibit 86 is a true and correct copy of Exhibit 24
8	to the deposition of Brian L. Sands, taken on November 15, 2010.
9	89. Attached hereto as Exhibit 87 is a true and correct copy of Exhibit 25
10	to the deposition of Brian L. Sands, taken on November 15, 2010.
11	90. Attached hereto as Exhibit 88 is a true and correct copy of Excerpts of
12	the transcript of the deposition of Joseph Sousa, taken on December 10, 2009.
13	91. Attached hereto as Exhibit 89 is a true and correct copy of Exhibit 5 to
14	the deposition of Joseph Sousa, taken on December 10, 2009.
15	92. Attached hereto as Exhibit 90 is a true and correct copy of Excerpts of
16	the transcript of the deposition of Joseph Sousa, taken on October 22, 2010.
17	93. Attached hereto as Exhibit 91 is a true and correct copy of Exhibit 3 to
18	the deposition of Joseph Sousa, taken on October 22, 2010.
19	94. Attached hereto as Exhibit 92 is a true and correct copy of Exhibit 7 to
20	the deposition of Joseph Sousa, taken on October 22, 2010.
21	95. Attached hereto as Exhibit 94 is a true and correct copy of a document
22	produced to us by Defendants from the Carveout of the MCSO archived email hard
23	drive (In compliance with this Court's July 16, 2010 Order, Defendants produced to
24	Plaintiffs "The Carve Out MCSO Archived Email" hard drive on July 30, 2010 (as
25	defined in the Protective Order dated August 5, 2010, (Dkt#333)), which contained
26	MCSO Archived Emails provided by Maricopa County), bearing production numbers
27	MCSO 0003188-97, 3205.

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hard drive bearing production numbers MCSO 0297781.

document produced to us by Defendants from the Carveout of the MCSO archived email

001838-40.

- Attached hereto as Exhibit 113 is a true and correct copy of a document produced to us by Defendants from the Carveout of the MCSO archived email
- Attached hereto as Exhibit 114 is a true and correct copy of a document produced to us by Defendants from the Carveout of the MCSO archived email
- Attached hereto as Exhibit 115 is a true and correct copy of a document produced to us by Defendants from the Carveout of the MCSO archived email
- Attached hereto as Exhibit 116 is a true and correct copy of a document produced to us by Defendants from the Carveout of the MCSO archived email
- Attached hereto as Exhibit 117 is a true and correct copy of a document produced to us by Defendants from the Carveout of the MCSO archived email
- Attached hereto as Exhibit 118 is a true and correct copy of a document produced to us by Defendants bearing production numbers Melendres MCSO
- Attached hereto as Exhibit 119 is a true and correct copy of a document produced to us by Defendants bearing production numbers Melendres MCSO
- Attached hereto as Exhibit 120 is a true and correct copy of a document produced to us by Defendants bearing production numbers Melendres MCSO
- 122. Attached hereto as Exhibit 121 is a true and correct copy of a document produced to us by Defendants bearing production numbers Melendres MCSO

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001926-39.

document produced to us by Defendants bearing production numbers Melendres MCSO

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014686.

document produced to us by Defendants bearing production numbers Melendres MCSO

014968-76.

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document produced to us by Defendants bearing production numbers Melendres MCSO

058708-30.

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document produced to us by Defendants bearing production numbers OSLS 000121.

1	187. Attached hereto as Exhibit 186 is a true and correct copy of a
2	document produced to us by Defendants bearing production numbers OSLS0000171,
3	174-175, 178-179, 189-190, 303.
4	188. Attached hereto as Exhibit 187 is a true and correct copy of a
5	document produced to us by Defendants bearing production numbers OSLS 000591-95.
6	189. Attached hereto as Exhibit 188 is a true and correct copy of a
7	document produced to us by Defendants bearing production numbers OSLS 001057.
8	190. Attached hereto as Exhibit 189 is a true and correct copy of a
9	document produced to us by Defendants bearing production numbers OSLS 001058-60.
10	191. Attached hereto as Exhibit 190 is a true and correct copy of a
11	document produced to us by Defendants bearing production numbers OSLS 001235.
12	192. Attached hereto as Exhibit 191 is a true and correct copy of a
13	document produced to us by Defendants bearing production numbers OSLS 001245-46.
14	193. Attached hereto as Exhibit 192 is a true and correct copy of a
15	document produced to us by Defendants bearing production numbers OSLS 002976-89.
16	194. Attached hereto as Exhibit 193 is a true and correct copy of a
17	document produced to us by Defendants bearing production numbers OSLS 002990.
18	195. Attached hereto as Exhibit 194 is a true and correct copy of a
19	document produced to us by Defendants bearing production numbers OSLS 003218.
20	196. Attached hereto as Exhibit 195 is a true and correct copy of a
21	document produced to us by Defendants bearing production numbers OSLS 003221.
22	197. Attached hereto as Exhibit 196 is a true and correct copy of a
23	document produced to us by Defendants bearing production numbers OSLS 003243-44.
24	198. Attached hereto as Exhibit 197 is a true and correct copy of a
25	document produced to us by Defendants bearing production numbers OSLS 003259-60.
26	199. Attached hereto as Exhibit 198 is a true and correct copy of a
27	document produced to us by Defendants bearing production numbers OSLS 004172.

1	200. Attached hereto as Exhibit 199 is a true and correct copy of a
2	document produced to us by Defendants bearing production numbers OSLS 004525.
3	201. Attached hereto as Exhibit 200 is a true and correct copy of a
4	document produced to us by Defendants bearing production numbers OSLS 005154.
5	202. Attached hereto as Exhibit 201 is a true and correct copy of a
6	document produced to us by Defendants bearing production numbers OSLS 005516-18.
7	203. Attached hereto as Exhibit 202 is a true and correct copy of a
8	document produced to Defendants bearing production numbers ORT 000096-102.
9	204. Attached hereto as Exhibit 203 is a true and correct copy of a
10	document produced to Defendants bearing production numbers ORT 000105-06.
11	205. Attached hereto as Exhibit 204 is a true and correct copy of a
12	document produced to Defendants bearing production numbers ORT 000109-110.
13	206. Attached hereto as Exhibit 205 is a true and correct copy of a
14	document produced to Defendants bearing production numbers ORT 000116.
15	207. Attached hereto as Exhibit 206 is a true and correct copy of a
16	document produced to Defendants bearing production numbers ORT 000425-26.
17	208. Attached hereto as Exhibit 207 is a true and correct copy of a
18	document produced to Defendants bearing production numbers ORT 000613-14.
19	209. Attached hereto as Exhibit 208 is a true and correct copy of a
20	document produced to Defendants bearing production numbers ORT 000637-39.
21	210. Attached hereto as Exhibit 209 is a true and correct copy of a
22	document produced to Defendants bearing production numbers ORT 001239-40.
23	211. Attached hereto as Exhibit 210 is a true and correct copy of a
24	document produced to Defendants bearing production numbers ORT 001246.
25	212. Attached hereto as Exhibit 211 is a true and correct copy of
26	excerpts from a document produced to Defendants bearing production numbers ORT
27	001259-60, 1292, 1352.

1	213. Attached hereto as Exhibit 212 is a true and correct copy of the
2	Report of Steven Camarota, Ph.D., Hispanic Surname Analysis of Maricopa County
3	Sheriff's Office Patrol Activity 2005 to 2009, dated January 20, 2011.
4	214. Attached hereto as Exhibit 213 is a true and correct copy of
5	Defendant Maricopa County Sheriff's Office Answers to Plaintiffs' First Set of
6	Interrogatories, dated March 27, 2009.
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8	EXECUTED this 29th day of April, 2011, in San Francisco, California.
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10	<u>/s/ Kevin Hickey</u> Kevin Hickey
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CERTIFICATE OF SERVICE I hereby certify that on the 29th day of April, 2011 I caused the attached document to be electronically transmitted to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF Registrants: Thomas P. Liddy tliddy@mail.maricopa.gov Maria R. Brandon brandonm@mail.maricopa.gov Timothy P. Casey timcasey@azbarristers.com' Attorneys for Defendant Sheriff Joseph Arpaio and the Maricopa County Sherriff's Office /s/ Kevin Hickey