

1
2 ACLU Foundation of Arizona
3 Daniel J. Pochoda
4 dpochoda@acluaz.org
5 3707 North 7th St., Ste. 235
6 Phoenix, AZ 85014
7 Telephone: (602) 650-1854
8 Facsimile: (602) 650-1376

9 *Attorneys for Plaintiffs (Additional attorneys*
10 *for Plaintiffs listed on next page)*

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

15 Manuel de Jesus Ortega Melendres,
16 et al.,

17 Plaintiff(s),

18 v.

19 Joseph M. Arpaio, et al.,

20 Defendants(s).

21) CV-07-2513-PHX-GMS
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PLAINTIFFS' RESPONSE TO
DEFENDANTS' ALLEGATIONS RE
POTENTIAL MONITOR
ROBERT WARSHAW

Additional Attorneys for Plaintiffs:

Tammy Albarran (*Pro Hac Vice*)
talbarran@cov.com
David Hults (*Pro Hac Vice*)
dhults@cov.com
Covington & Burling LLP
1 Front Street
San Francisco, CA 94111-5356
Telephone: (415) 591-6000
Facsimile: (415) 591-6091

Lesli Gallagher (*Pro Hac Vice*)
lgallagher@cov.com
Covington & Burling LLP
9191 Towne Centre Drive, 6th Floor
San Diego CA 92122
Telephone: (858) 678-1800
Facsimile: (858) 678-1600

Dan Pochoda
dpochoda@acluaz.org
James Lyall
jlyall@acluaz.org
ACLU Foundation of Arizona
3707 N. 7th St., Ste. 235
Phoenix, AZ 85014
Telephone: (602) 650-1854
Facsimile: (602) 650-1376

Anne Lai (*Pro Hac Vice*)
alai@law.uci.edu
401 E. Peltason, Suite 3500
Irvine, CA 92697-8000
Telephone: (949) 824-9894
Facsimile: (949) 824-0066

Cecillia Wang (*Pro Hac Vice*)
cwang@aclu.org
ACLU Foundation
Immigrants' Rights Project
39 Drumm Street
San Francisco, California 94111
Telephone: (415) 343-0775
Facsimile: (415) 395-0950

Andre Segura (*Pro Hac Vice*)
asegura@aclu.org
ACLU Foundation
Immigrants' Rights Project
125 Broad Street, 17th Floor
New York, NY 10004
Telephone: (212) 549-2676
Facsimile: (212) 549-2654

1 Nancy Ramirez (*Pro Hac Vice*)
2 nramirez@maldef.org
3 Mexican American Legal Defense and
4 Educational Fund
5 634 South Spring Street, 11th Floor
6 Los Angeles, California 90014
7 Telephone: (213) 629-2512
8 Facsimile: (213) 629-0266
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Plaintiffs object to the tactics of Defendants in seeking to impugn Robert Warshaw, one of Plaintiffs' candidates for Monitor. Defendants' counsel were provided the name of Mr. Warshaw four weeks ago as one of Plaintiffs' candidates, as part of an attempt to find agreement on a candidate. Defendants informed Plaintiffs that they were interested in the possibility of Mr. Warshaw serving as monitor and would contact Mr. Warshaw as part of their diligence. Plaintiffs' counsel spoke with Mr. Warshaw and he agreed to make himself fully available for discussion with Defendants. Defendants put off two meetings with Plaintiffs on the ground that they had not yet attempted to reach Mr. Warshaw. Defendants raised no negative information about Mr. Warshaw, nor did they seek input on any of the news media stories about Mr. Warshaw. Today, hours before the Court's deadline for submitting written information on the candidates, Defendants present the Court with several news media reports of unfounded accusations and allegations involving Mr. Warshaw and family members. Mr. Warshaw will discuss all of these accusations and allegations with the Court in his interview with the Court. Given the timing and circumstances of this submission and that fact that Mr. Warshaw is presently out of the country, at this time no other written submission will be submitted in response to these news media reports.

RESPECTFULLY SUBMITTED this 20th day of December, 2013.

By /s/Daniel J. Pochoda
Daniel J. Pochoda
dpochoda@acluaz.org
ACLU Foundation of Arizona
3707 N. 7th St., Ste. 235
Phoenix, AZ 85014
Telephone: (602) 650-1854
Facsimile: (602) 650-1376

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Stanley Young (*Pro Hac Vice*)
COVINGTON & BURLING LLP
333 Twin Dolphin Drive
Suite 700
Redwood Shores, CA 94065-1418

Tammy Albarran (*Pro Hac Vice*)
talbarran@cov.com
David Hults (*Pro Hac Vice*)
dhults@cov.com
Covington & Burling LLP
1 Front Street
San Francisco, CA 94111-5356
Telephone: (415) 591-6000
Facsimile: (415) 591-6091

Lesli Gallagher (*Pro Hac Vice*)
lgallagher@cov.com
Covington & Burling LLP
9191 Towne Centre Drive, 6th Floor
San Diego CA 92122
Telephone: (858) 678-1800
Facsimile: (858) 678-1600

Anne Lai (*Pro Hac Vice*)
alai@law.uci.edu
401 E. Peltason, Suite 3500
Irvine, CA 92697-8000
Telephone: (949) 824-9894
Facsimile: (949) 824-0066

Cecillia Wang (*Pro Hac Vice*)
cwang@aclu.org
ACLU Foundation
Immigrants' Rights Project
39 Drumm Street
San Francisco, California 94111
Telephone: (415) 343-0775
Facsimile: (415) 395-0950

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Andre Segura (*Pro Hac Vice*)
asegura@aclu.org
ACLU Foundation
Immigrants' Rights Project
125 Broad Street, 17th Floor
New York, NY 10004
Telephone: (212) 549-2676

Nancy Ramirez (*Pro Hac Vice*)
nramirez@maldef.org
Mexican American Legal Defense and
Educational Fund
634 South Spring Street, 11th Floor
Los Angeles, California 90014
Telephone: (213) 629-2512
Facsimile: (213) 629-0266

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2013, I electronically transmitted the attached document to the Clerk's office using the CM/ECF System for filing and caused the attached document to be e-mailed to:

Thomas P. Liddy
liddyt@mcao.maricopa.gov

Ann Uglietta
uglietta@mcao.maricopa.gov

Timothy J. Casey
timcasey@azbarristers.com

*Attorneys for Defendant Sheriff Joseph Arpaio and the
Maricopa County Sherriff's Office*

/s/ Gloria A. Torres
Paralegal