

1 Mark Kappelhoff  
2 Deputy Assistant Attorney General  
3 Judy Preston (MD Bar, no numbers assigned)  
4 Timothy D. Mygatt (DC Bar No. 1021564)  
5 Edward G. Caspar (MA Bar No. 650566)  
6 Jennifer L. Mondino (NY Bar No. 4141636)  
7 Paul Killebrew (LA Bar No. 32176)  
8 Puneet Cheema (CA Bar No. 268677)  
9 U.S. Department of Justice, Civil Rights Division  
10 Special Litigation Section  
11 601 D St. NW, Suite 5200  
12 Washington, D.C. 20004  
13 Attorneys for the United States

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

16 United States of America,

17 Plaintiff,

18 v.

19 Maricopa County, Arizona; and Joseph M.  
20 Arpaio, in his official capacity as Sheriff of  
21 Maricopa County, Arizona,

22 Defendants.

No. 2:12-cv-00981-ROS

NOTICE CONCERNING TRIAL  
DATE

23 Pursuant to the Court's June 10, 2015 Order Setting Bench Trial, the United States  
24 files this notice that the parties conferred today and determined that no party has a  
25 conflict with the trial dates set by the Court.

26 The United States further advises that it anticipates that more than fifteen (15)  
27 days will be needed to try this case. Because the pending summary judgment motions do  
28 not address all aspects of the case, trial will be held at least on the United States' claims  
that defendants engaged in a pattern or practice of carrying out workplace raids in  
violation of the Fourth and Fourteenth Amendment. In a similar case involving  
allegations that the "Immigration and Naturalization Service (INS) has engaged in a  
pattern and practice of carrying out workplace raids in violation of the Fourth

1 Amendment,” the court noted that trial took “four calendar months.” *Pearl Meadows*  
2 *Mushroom Farm, Inc. v. Nelson*, 723 F. Supp. 432, 435 (N.D. Cal. 1989). The United  
3 States does not anticipate that four months would be required in this case, but submits  
4 that a just determination of the issues involved in this multiple pattern-or-practice case  
5 likely will require more than fifteen (15) days. The parties will continue to confer and,  
6 consistent with the Court’s June 10, 2014 Order and model Joint Proposed Pretrial Order,  
7 advise the court of the anticipated length of trial on July 10, 2015.

8 Respectfully submitted,

9 Mark Kappelhoff  
10 Deputy Assistant Attorney General  
11 Civil Rights Division

12 Judy Preston  
13 Acting Chief, Special Litigation Section

14 Timothy D. Mygatt  
15 Special Counsel

16 /s/ Edward G. Caspar  
17 Edward G. Caspar (MA Bar No. 650566)  
18 Special Counsel  
19 Jennifer L. Mondino (NY Bar No. 4141636)  
20 Paul Killebrew (LA Bar No. 32176)  
21 Puneet Cheema (CA Bar No. 268677)  
22 Trial Attorneys  
23 U.S. Department of Justice  
24 Civil Rights Division- PHB  
25 950 Pennsylvania Avenue, NW  
26 Washington, D.C. 20530  
27 Tel. (202) 514-2000/Fax (202) 514-6273  
28 edward.g.caspar@usdoj.gov

ATTORNEYS FOR THE UNITED STATES