

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

TOHONO O’ODHAM NATION,)	
)	
Plaintiff,)	
)	
v.)	
)	
KENNETH L. SALAZAR, in his official capacity as Secretary of the United States Department of the Interior,)	Civil Action No. 1:10-cv-472-JDB
)	
)	
Defendant,)	
)	
CITY OF GLENDALE, ARIZONA,)	
)	
Defendant-Intervenor.)	

**CITY OF GLENDALE’S RESPONSE TO MOTION FOR LEAVE TO USE
DEMONSTRATIVE AIDS DURING JUNE 21 MOTIONS HEARING**

The City of Glendale registered its objection to the Nation’s use of the demonstrative maps because the maps are inaccurate and misleading. They do not, as the Nation asserts, “show Parcel 2 in relation to the entire City of Glendale” nor do they show all of Glendale’s “incorporated territory.” Mot. at 2. As the Nation is forced by undisputed facts to admit, *see* Mot. at 2 n.2, the maps it proffers do *not* reflect all areas incorporated by the City – an omission amounting to miles and miles of territory that forms Glendale’s perimeter and encloses Parcel 2. *Compare* Mot. Ex. A-2 with AR 2624, AR 4043, AR 4359 (submitted as part of Mot. Ex. 3). Thus, any consideration of the Nation’s maps as a demonstrative tool must take into account the maps’ patent infirmities.

Respectfully submitted,

s/Audrey E. Moog

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