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9 Attorneys for Arizona Municipal Risk Retention Pool

10
 11 IN THE UNITED STATES DISTRICT COURT
 12 FOR THE DISTRICT OF ARIZONA

13
 14 THE UNITED STATES OF
 AMERICA,

15 Plaintiff,

16 vs.

17
 18 THE STATE OF ARIZONA, *et al.*,

19 Defendants.

No. 2:10-cv-01413-SRB

**MOTION FOR LEAVE TO FILE
 AMICUS CURIAE
 MEMORANDUM**

20
 21
 22 The Arizona Municipal Risk Retention Pool moves this Court for an order
 23 allowing it to file the attached, proposed amicus curiae memorandum. This
 24 motion is based on the accompanying Memorandum of Points and Authorities.
 25
 26
 27

1 July 19, 2010.

2
3 /s/ Donald M. Peters

4 Donald M. Peters

5
6
7 **MEMORANDUM OF POINTS AND AUTHORITIES**

8
9 The Arizona Municipal Risk Retention Pool (“the Insurance Pool”) is a
10 self-insurance pool for Arizona cities and towns. The Insurance Pool is owned
11 and operated by the seventy-four cities and towns that comprise its membership.
12 A list of the Insurance Pool’s members is attached as an appendix to this motion.
13 The Insurance Pool is essentially the self-insurance and risk-management arm of a
14 large number of Arizona’s municipalities.

15 The Insurance Pool takes no position on the underlying merits of this
16 dispute. It has a significant practical and financial interest, however, in one aspect
17 of the United States’ request for a preliminary injunction. Until this Court renders
18 a ruling on the merits, the Insurance Pools’ members face the prospect of
19 significant liabilities regardless of how they approach S.B. 1070, as explained
20 more fully in the accompanying memorandum. That dilemma can be alleviated if
21 the Court will stay one portion of S.B. 1070 pending a ruling on the merits.

22 The Court is therefore requested to enter an order permitting the Insurance
23 Pool to participate as amicus curiae and to consider the points raised in the
24 accompanying memorandum.

1 July 19, 2010.

2 LaSOTA & PETERS PLC

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4 By: /s/Donald M. Peters

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15 Original of the foregoing electronically
16 filed this 19th day of July, 2010 with:

17 Clerk of the United States District Court
18 For the District of Arizona
19 401 W. Washington Street
20 Phoenix, AZ 85003

21 Copy of the foregoing hand-delivered this
22 19th day of July, 2010, to:

23 The Honorable Susan R. Bolton
24 United States District Court
25 For the District of Arizona
26 401 W. Washington Street
27 Phoenix, AZ 85003

1 Copy of the foregoing mailed and emailed this
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APPENDIX

LIST OF MEMBERS OF ARIZONA MUNICIPAL RISK RETENTION POOL

City of Apache Junction	Town of Miami
City of Avondale	Town of Marana
City of Benson	City of Maricopa
City of Bisbee	Town of Oro Valley
Town of Buckeye	Town of Paradise Valley
City of Bullhead City	Town of Parker
Town of Camp Verde	Town of Patagonia
Town of Carefree	Town of Payson
City of Casa Grande	Town of Pima
Town of Cave Creek	Town of Pinetop/Lakeside
Town of Chino Valley	Town of Prescott Valley
Town of Clarkdale	Town of Quartzsite
Town of Clifton	Town of Queen Creek
Town of Colorado City	City of Safford
City of Coolidge	Town of Sahuarita
City of Cottonwood	City of St. Johns
Town of Dewey-Humboldt	City of San Luis
Town of Diamond Star Valley	City of Sedona
Town of Duncan	City of Show Low
Town of Eagar	City of Sierra Vista
City of Eloy	Town of Snowflake
City of El Mirage	City of Somerton
Town of Florence	City of South Tucson
Town of Fountain Hills	Town of Springerville
Town of Fredonia	Town of Superior
Town of Gila Bend	City of Surprise
City of Globe	Town of Taylor
City of Goodyear	Town of Thatcher
Town of Guadalupe	Town of Tusayan
Town of Hayden	City of Tolleson
City of Holbrook	City of Tombstone
City of Huachuca City	Town of Wellton
Town of Jerome	Town of Wickenburg

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Town of Kearny
City of Kingman
City of Litchfield Park
Town of Mammoth

City of Willcox
Town of Winkelman
City of Winslow
Town of Youngtown
League of AZ Cities &
Towns