

1 William R. Jones, Jr., Bar #001481
 John T. Masterson, Bar #007447
 2 Joseph J. Popolizio, Bar #017434
 JONES, SKELTON & HOCHULI, P.L.C.
 3 2901 North Central Avenue, Suite 800
 Phoenix, Arizona 85012
 4 Telephone: (602) 263-1700
 Fax: (602) 200-7801
 5 wjones@jshfirm.com
 jmasterson@jshfirm.com
 6 jpopolizio@jshfirm.com

7 Attorneys for Defendants Maricopa County
 Sheriff's Office and Joseph M. Arpaio
 8

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF ARIZONA**

11 United States of America,

12 Plaintiff,

13 v.

14 Maricopa County, Arizona; Maricopa County
 Sheriff's Office; and Joseph M. Arpaio, in his
 15 official capacity as Sheriff of Maricopa
 County, Arizona,
 16

17 Defendants.

NO. CV10-01878-PHX-GMS

**STIPULATED MOTION TO
 EXTEND DEADLINE TO FILE
 REPLY IN SUPPORT OF CROSS-
 MOTION FOR SUMMARY
 JUDGMENT**

***(EXPEDITED CONSIDERATION
 REQUESTED)***

18
 19 Plaintiff and Defendants jointly stipulate and move this Court for an Order
 20 extending the deadline by which Defendants must file their Reply in Support of their
 21 Cross-Motion for Summary Judgment (Dkt. 40). The current deadline is February 25,
 22 2011. The parties have stipulated that a 60-day extension of this deadline until April 26,
 23 2011 is appropriate.

24 This stipulated request affects no other deadline; the Court has not set this
 25 case for trial or hearing. Moreover, this Stipulated Motion is not made for the purposes of
 26 delay, but because the parties are earnestly attempting to resolve this action without
 27 continued litigation. To that end, the parties have made great strides.
 28

1 Since December 21, 2010, Plaintiff has conducted, and Defendants have
2 allowed, requested tours of Maricopa County Jail facilities, as well as interviews of
3 Maricopa County Sheriff's Office (MCSO) staff, detention officers, posse members and
4 command staff, and additional inmates.

5 In addition to the above mentioned interviews, the parties inform the Court
6 that Plaintiff may request follow-up interviews, as well as interviews of individuals
7 mentioned during prior interviews that Plaintiff has conducted.

8 Furthermore, during this time period, Defendants have also produced
9 voluminous documentation pursuant to Plaintiff's requests, in addition to that previously
10 provided.

11 The parties now require this additional time to schedule any follow-up
12 interviews, to identify any additional documents Plaintiff may need to review, and to
13 develop an agreement that provides a framework for dealing with any future requests for
14 information by the government. The parties are confident that within the next two
15 months their efforts will obviate the need for the Court to act on the Motion for Summary
16 Judgment and Cross Motions for Summary Judgment.

17 Accordingly, the parties respectfully request that the Court enter an Order
18 extending the deadline by which Defendants must file their Reply in Support of their
19 Cross-Motion for Summary Judgment to April 26, 2011. A proposed form of Order is
20 attached.

1 DATED this 24th day of February, 2011.

2 JONES, SKELTON & HOCHULI, P.L.C.

POLSINELLI SHUGHART, P.C.

3
4 By /s/Joseph J. Popolizio

5 William R. Jones, Jr.
6 John T. Masterson
7 Joseph J. Popolizio
8 2901 North Central Avenue, Suite 800
Phoenix, Arizona 85012
Attorneys for Defendants Maricopa
County Sheriff's Office and Joseph
M. Arpaio

By /s/Thomas K. Irvine w/permission

Thomas K. Irvine
Cynthia R. Estrella
Polsinelli Shughart, P.C.
One East Washington, Suite 1200
Phoenix, Arizona 85004
Attorneys for Maricopa County

9
10 U.S. DEPARTMENT OF JUSTICE,
11 CIVIL RIGHTS DIVISION

12 By /s/Avner Shapiro w/permission

13 Thomas E. Perez
14 Dennis K. Burke
15 Roy L. Austin, Jr.
16 Matthew Colangelo
17 Peter S. Gray
18 Avner Shapiro
19 Laurie A. Gelman
20 Amin Aminfar
21 950 Pennsylvania Avenue, N.W.
22 Washington, D.C. 20530
23 Michael M. Walker
24 Assistant U.S. Attorney
25 Two Renaissance Square
26 40 North Central Avenue, Suite 1200
27 Phoenix, Arizona 85004
28 Attorneys for the United States

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this 24th day of February, 2011.

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this 24th day of February, 2011, to:

Thomas E. Perez, Assistant Attorney General
Dennis K. Burke, United States Attorney
Roy L. Austin, Jr.
Matthew Colangelo
Peter S. Gray
Laurie A. Gelman
Admin Amnifar
U.S. Department of Justice, Civil Rights Division
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530
Attorneys for the United States

Michael M. Walker
Assistant U.S. Attorney
Two Renaissance Square
40 North Central Avenue, Suite 1200
Phoenix, Arizona 85004
Attorneys for the United States

Thomas K. Irvine
Cynthia R. Estrella
Polsinelli Shughart, P.C.
One East Washington, Suite 1200
Phoenix, Arizona 85004
Attorneys for Maricopa County

/s/ Joseph J. Popolizio