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Thomas E. Perez  
Assistant Attorney General  
Dennis K. Burke  
United States Attorney  
Roy L. Austin, Jr. (IL Bar #6228785)  
Matthew Colangelo (NY Bar #4228797)  
Jonathan Smith (DC Bar #396578)  
Avner Shapiro (DC Bar #452475)  
Peter S. Gray (DC Bar #940031)  
Laurie A. Gelman (VA Bar #47743)  
Amin Aminfar (NC Bar #36589)  
Sergio Perez (CA Bar #274798)  
U.S. Department of Justice, Civil Rights Division  
950 Pennsylvania Avenue, N.W.  
Washington, DC 20530  
(ph) 202-514-6225 / (fax) 202-514-4883,  
(email) amin.aminfar@usdoj.gov

Michael M. Walker (AZ Bar #20315)  
Assistant U.S. Attorney  
Two Renaissance Square  
40 North Central Avenue, Suite 1200  
Phoenix, AZ 85004-4408  
(ph) 602-514-7500 / (fax) 602-514-7760,  
(email) michael.walker4@usdoj.gov

Attorneys for the United States

UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA

United States of America,  
  
Plaintiff,  
  
v.  
  
Maricopa County, Arizona; Maricopa  
County Sheriff's Office; and Joseph M.  
Arpaio, in his official capacity as Sheriff of  
Maricopa County, Arizona,  
  
Defendants.

No. 2:10-cv-01878-GMS

**JOINT MOTION TO REMOVE  
CASE TO THE INACTIVE  
DOCKET AND STAY  
PROCEEDINGS**

1 In an effort to resolve this action pursuant to agreement and to avoid protracted  
2 litigation, Plaintiff, the United States of America, and Defendants, Sheriff Joseph M.  
3 Arpaio and Maricopa County Sheriff's Office, pursuant to the terms of the Agreement  
4 attached as Exhibit A, respectfully move this Court for an order removing this case to  
5 the Court's inactive docket and staying any proceedings on the parties' pending  
6 Motions for Summary Judgment (Dkt. 18, 40, 43, and related filings) for sixty (60)  
7 days or until further order of the Court. After the sixty (60) calendar days and subject  
8 to substantial compliance with the terms of the Agreement, either Plaintiff will file a  
9 Motion to Dismiss the United States' First Amended Complaint without prejudice  
10 pursuant to Fed. R. Civ. P. 41(a)(2) or a defendant could exercise its rights under the  
11 Agreement and move for dismissal.

12 For the foregoing reasons and due to the parties' Agreement, the parties  
13 respectfully move this Court for an order removing this case to the inactive docket and  
14 staying further proceedings on the parties' respective Motions for Summary Judgment.

15  
16 Dated: June 2, 2011

17 Jones, Skelton & Hochuli, P.L.C.

18 /s/ Joseph J. Popolizio  
19 William R. Jones, Jr.  
20 John T. Masterson  
21 Joseph J. Popolizio  
22 2901 North Central Avenue, Suite 800  
23 Phoenix, Arizona 85012  
24 Attorneys for named Defendants  
25 Maricopa County Sheriff's Office and  
26 Joseph M. Arpaio

Respectfully submitted,

United States Department of Justice  
Civil Rights Division

Thomas E. Perez  
Assistant Attorney General

Dennis K. Burke  
United States Attorney

/s/ Amin Aminfar  
Roy L. Austin, Jr.  
Matthew Colangelo  
Jonathan Smith  
Avner Shapiro  
Peter S. Gray  
Laurie A. Gelman  
Amin Aminfar  
Sergio Perez  
U.S. Department of Justice  
Civil Rights Division  
950 Pennsylvania Avenue, N.W.  
Washington, DC 20530  
(ph) 202-514-6255 / (fax) 202-514-4883  
(email) amin.aminfar@usdoj.gov

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Michael M. Walker  
Assistant U.S. Attorney  
Two Renaissance Square  
40 North Central Avenue, Suite 1200  
Phoenix, AZ 85004-4408  
(ph) 602-514-7500 / (fax) 602-514-7760  
(email) michael.walker4@usdoj.gov

Attorneys for the United States

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 2, 2011, I electronically transmitted the attached document to the Clerk’s Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Thomas K. Irvine  
Polsinelli Shughart PC  
3636 N. Central Avenue, Suite 1200  
Phoenix, AZ 85012

Cynthia Renee Estrella  
Polsinelli Shughart PC  
1 E. Washington Street, Suite 1200  
Phoenix, AZ 85004

William R. Jones, Jr.  
Jones Skelton & Hochuli PLC  
2901 N. Central Avenue, Suite 800  
Phoenix, AZ 85012

John T. Masterson  
Jones Skelton & Hochuli PLC  
2901 N. Central Avenue, Suite 800  
Phoenix, AZ 85012

Joseph John Popolizio  
Jones Skelton & Hochuli PLC  
2901 N. Central Avenue, Suite 800  
Phoenix, AZ 85012

*Attorneys for Defendants*

/s/ Amin Aminfar  
Amin Aminfar