

Snell & Wilmer

LLP
LAW OFFICES
One Arizona Center, 400 E. Van Buren
Phoenix, Arizona 85004-2202
(602) 382-6000

1 John J. Bouma (#001358)
Robert A. Henry (#015104)
2 Joseph G. Adams (#018210)
SNELL & WILMER L.L.P.
3 One Arizona Center
400 E. Van Buren
4 Phoenix, AZ 85004-2202
Phone: (602) 382-6000
5 Fax: (602) 382-6070
jbouma@swlaw.com

6
7 Joseph A. Kanefield (#015838)
Office of Governor Janice K. Brewer
1700 W. Washington, 9th Floor
8 Phoenix, AZ 85007
Telephone: (602) 542-1586
9 Fax: (602) 542-7602
jkanefield@az.gov

10 *Attorneys for Defendant Janice K. Brewer,*
11 *Governor of the State of Arizona*

12 **IN THE UNITED STATES DISTRICT COURT**
13 **FOR THE DISTRICT OF ARIZONA**

14 Martin H. Escobar,
15
Plaintiff,

16 v.

17 Jan Brewer, Governor of the State of
18 Arizona, in her Official and Individual
Capacity; the City of Tucson, a
19 municipal corporation,
20
Defendants.

21 The City of Tucson,
22
Cross-plaintiff,

23 v.

24 The State of Arizona, a body politic; and
25 Jan Brewer, in her capacity as Governor
of the State of Arizona,
26
Cross-defendants.

Case No. CV10-00249-TUC-SRB

**JOINT STIPULATION AND
REQUEST FOR EXTENSION OF
TIME TO RESPOND TO PENDING
MOTIONS**

(First Request)

28

1 On July 8, 2010, this Court issued an order (doc. 70) regarding briefing schedules
2 on pending motions and ordered, among other things, that “each side shall have the time
3 allowed under the rules to respond and reply unless the parties agree to some extended
4 response or reply time.”

5 In light of the schedules established in related cases, plaintiff Martin H. Escobar,
6 defendant Janice K. Brewer (“Governor Brewer”), defendant/cross-plaintiff City of
7 Tucson (“Tucson”) have conferred and agreed, subject to the Court’s approval, to file
8 their responses to all pending motions by August 10, 2010, with replies in support of
9 motions to be filed by August 20, 2010. In particular, the responses covered by this
10 stipulation are the following:

- 11 • Plaintiff’s responses to motions to dismiss filed by Governor Brewer (docs.
12 55 and 56, filed on June 23, 2010).
- 13 • Governor Brewer’s response to plaintiff’s motion for preliminary injunction
14 (doc. 71, filed on July 8, 2010).
- 15 • Tucson’s response to the motion for judgment on the pleadings filed by
16 Governor Brewer (doc. 68, filed on July 2, 2010).
- 17 • Governor Brewer’s response to Tucson’s motion for preliminary injunction
18 (doc. 72, filed on July 8, 2010).

19 Accordingly, the parties jointly request that the Court extend the dates for these
20 responses to August 10, 2010, with replies to be due by August 20, 2010. A proposed
21 order is attached hereto.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Respectfully submitted this 12th day of July, 2010.

SNELL & WILMER L.L.P.

By s/John J. Bouma
John J. Bouma
Robert A. Henry
Joseph G. Adams
One Arizona Center
400 E. Van Buren
Phoenix, AZ 85004-2202

and

By s/Joseph A. Kanefield with permission
Joseph A. Kanefield
Office of Governor Janice K. Brewer
1700 W. Washington, 9th Floor
Phoenix, AZ 85007

*Attorneys for Defendant Janice K. Brewer,
Governor of the State of Arizona*

MICHAEL G. RANKIN
City Attorney

By s/Michael W.L. McCrory with permission
Michael W.L. McCrory
Principal Assistant City Attorney
P.O. box 27210
Tucson, AZ 85726-7210

Attorneys for City of Tucson

By s/Richard M. Martinez with permission
Richard M. Martinez
307 South Convent Avenue
Tucson, AZ 85701

and

Stephen Montoya
Augustine B. Jimenez III
Montoya Jimenez, P.A.
The Great American Tower
3200 N. Central Ave., Suite 2550
Phoenix, AZ 85012

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on July 12, 2010, 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 CM/ECF registrants on record:

s/John J. Bouma

11721025.1

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28