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10 **UNITED STATES DISTRICT COURT**
11
12 **DISTRICT OF ARIZONA**

13 Manuel De Jesus Ortega Melendres, on behalf
14 of himself and all others similarly situated;
15 et. al.,

16 Plaintiffs,

17 and

18 United States of America,

19 Plaintiff-Intervenor,

20 v.

21 Paul Penzone, in his official capacity as
22 Sheriff of Maricopa County, Arizona, et. al.,

23 Defendants.

No. CV-07-2513-PHX-GMS

**STIPULATION PERTAINING TO
MARICOPA COUNTY
SHERIFF'S OFFICE'S
PARAGRAPH 70 PLAN**

24
25 Attached hereto as Exhibit A is the stipulated plan that representatives for Sheriff
26 Penzone, Plaintiffs and Plaintiff-Intervenors have been working on in response to the
27 Court's July 27, 2017, Order (Document 2094) which stated:
28

1 Prior to the status conference [September 27, 2017] the parties shall have
2 agreed to the necessary elements and timetable for the implementation of an
3 institutional bias remediation program within MCSO. To the extent the
4 parties cannot agree to all of the terms of such a plan they shall submit a
5 single document outlining a plan which clearly indicates by color coding or
6 otherwise, the elements of the plan on which all parties agree, and the
7 position of each party as to the respective parts of the plan on which the
8 parties do not agree.

9 The parties, to make sure they had the Plan to the Court and Monitor in plenty of
10 time for them to review before the September 27, 2017, status conference, contacted the
11 Monitor to determine when he wanted the plan submitted for his review. The parties were
12 asked to submit the plan no later than September 12, 2017, in the manner ordered by the
13 Court. The stipulated Plan was forwarded to the Monitor by close of business on
14 September 12, 2017, for his review prior to the September 27, 2017, status conference.

15 The parties have consulted and diligently worked together during the interim to
16 prepare this stipulated plan, which includes the target dates set forth therein and a strategy
17 on moving forward. The parties request that the Court approve this Plan as submitted,
18 though the parties understand that the Court may want to obtain input from the Monitor.

19 **RESPECTFULLY SUBMITTED** this 21st day of September, 2017.

20 WILLIAM G. MONTGOMERY
21 MARICOPA COUNTY ATTORNEY

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CERTIFICATE OF SERVICE

I hereby certify that on September 21, 2017, I caused the foregoing document to be electronically transmitted to the Clerk's Office using the CM/ECF System for filing and served on counsel of record via the Court's CM/ECF system.

/s/ Nicole Anderson

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