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1 I, Stanley Young, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted
3 *pro hac vice* in the United States District Court for the District of Arizona, for
4 purposes of the underlying action, *Ortega Melendres, et al., v. Arpaio, et al.*, No. CV
5 07-2513-PHX-GMS. I am a partner in the Redwood Shores, California office of
6 Covington & Burling LLP (“Covington”). I make this declaration on personal
7 knowledge except where otherwise indicated.
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10 2. On February 12, 2015, the Court issued an Order (Doc. 881) allowing Plaintiffs
11 to take certain discovery in connection with the Court’s Order to Show Cause issued
12 that same day (Doc. 880). Defendants were ordered to produce various documents by
13 February 27, 2015, including, “b. All documents relating to any individuals who were
14 the subject of any U.S. Immigrations and Customs Enforcement (ICE) or U.S.
15 Customs and Border Protection (CBP) inquiry and/or individuals who were detained
16 by MCSO after December 23, 2011 based upon suspected unlawful presence in the
17 United States, and who were not charged with or cited for any crime.”
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20 3. On February 27, 2015, Defendants produced some documents. Our review of
21 those documents has disclosed possible deficiencies, which were the subject of a letter
22 written on March 11, 2015 by Leslie Harvey of our firm to counsel for Defendants, a
23 true and correct copy of which is attached as Exhibit A. Among the issues noted is an
24 apparent deficiency in the production of documents pertaining to violations of the
25 December 23, 2011 preliminary injunction. As an example of this issue (not specified
26 in the letter), Plaintiffs have so far been unable to locate in the February 27, 2015
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1 production any incident reports for the September 20, September 26, October 8, 2012,
2 and November 1, 2012 incidents described on pages 5-8 of Plaintiffs' Memorandum
3 Of Law And Facts Re Contempt Proceedings And Request For Order To Show Cause,
4 filed January 8, 2015 (Doc. 843), and, as to the first three, noted on pages 12-13 of the
5 Court's Order to Show Cause (Doc. 880). Plaintiffs have incident reports and/or other
6 documents on the first three of those particular stops because Defendants' prior
7 counsel Mr. Casey provided them in 2012, but their apparent absence from the
8 February 27, 2015 production would call into question the adequacy of the collection
9 for that production and raise the possibility that other documents the Court ordered to
10 be produced by February 27, 2015 have in fact not been produced. Plaintiff to date
11 have not received a response to the questions set forth in Ms. Harvey's March 11, 2015
12 letter.
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16 4. The February 12, 2015 discovery order also permitted Plaintiffs to propound
17 certain interrogatories. On March 13, 2015, Defendants answered those
18 interrogatories. Exhibit B is a true and correct copy of those responses. Plaintiffs
19 believe that there are deficiencies in those responses, which are the subject of my letter
20 of March 17, 2015 to Defendants' counsel, a true and correct copy of which is attached
21 hereto as Exhibit C. My letter raised, among other things, the issue of the
22 completeness of Defendants' response to an interrogatory about meetings and
23 conversations regarding the December 23, 2011 preliminary injunction and the Court's
24 May 14, 2014 order about the collection of videos, and specifically noted at least one
25 apparent omission in the listing of meetings where the preliminary injunction was
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1 discussed. My letter also notes that Defendants' interrogatory response entirely fails to
2 list any meetings or discussions about the May 14, 2014 order, and requests
3 supplementation in that regard. We have not yet received a response to my March 17,
4 2015 letter.
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7 I declare under penalty of perjury under the laws of the United States of
8 America that the foregoing is true and correct to the best of my knowledge.

9 EXECUTED this 19th day of March, 2015, in Redwood Shores, California.
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12 /s/ Stanley Young
13 Stanley Young
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CERTIFICATE OF SERVICE

I hereby certify that on March 19, 2015, I electronically transmitted the attached document to the Clerk's office using the CM/ECF System for filing and caused the attached document to be e-mailed to:

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