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9 *Attorneys for Plaintiff*

10 **ARIZONA SUPERIOR COURT**
11 **MARICOPA COUNTY**

12 ACLU OF ARIZONA, a non-profit, civil
13 rights organization,

14 Plaintiff,

15 v.

16 ARIZONA DEPARTMENT OF
17 CORRECTIONS, a state agency,

18 Defendants.

19 Case No. CV2013-013531

20 **PLAINTIFF'S NOTICE OF**
21 **RESCHEDULING OF**
22 **30(b)(6) DEPOSITION**

23 *(Hon. Arthur T. Anderson)*

24 Plaintiff hereby notifies the Court that the parties have agreed that the deposition
25 of Dawn Northup, 30(b)(6) designee of the Arizona Department of Corrections be
26 rescheduled to Thursday, June 5, 2014 at 9:00 AM. A copy of the Amended 30(b)(6)
27 Notice of Deposition is attached as Exhibit A.

28 Dated this 29th day of May, 2014.

ACLU FOUNDATION OF ARIZONA

By /s/ Darrell L. Hill
Darrell L. Hill
Daniel J. Pochoda

Attorneys for Plaintiff

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on May 29, 2014 this document was electronically filed with
3 the Court and copies transmitted by U.S. Mail and by electronic transmission to:

4 The Hon Arthur Anderson
5 Maricopa County Superior Court
(East Court Building, 511)
6 101 West Jefferson
7 Phoenix, AZ 85003

8 Dawn Northup
9 General Counsel
Arizona Department of Corrections
10 1601 West Jefferson
Phoenix, AZ 85007

11 Charles A. Grube
12 Jeffrey Zick
13 Office of the Attorney General
14 1275 West Washington Street
Phoenix, AZ 85007

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16 /s/Gloria A. Torres
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EXHIBIT A

1 Daniel J. Pochoda (SBA 021979)
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9 *Attorneys for Plaintiff*

10 **ARIZONA SUPERIOR COURT**
11 **MARICOPA COUNTY**

12 ACLU OF ARIZONA, a non-profit, civil
13 rights organization,

14 Plaintiff,

15 v.

16 ARIZONA DEPARTMENT OF
17 CORRECTIONS, a state agency,

18 Defendants.

19) Case No. CV2013-013531
20)
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22) **PLAINTIFF'S THIRD AMENDED**
23) **NOTICE OF 30(B)(6)**
24) **DEPOSITION**

25) *Hon. Arthur T. Anderson*
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29 Please take notice that, pursuant to Ariz. R. of Civ. Proc. 30(b)(6), Plaintiff ACLU
30 of Arizona ("ACLU"), through it undersigned counsel, will take the deposition upon oral
31 examination of Dawn Northup, as designee of Defendant Arizona Department of
32 Corrections on Thursday, June 5, 2014, commencing at 9:00 AM at the offices of the
33 ACLU FOUNDATION OF ARIZONA, 3707 North 7th Street, Suite 235, Phoenix, AZ
34 85014

35 Pursuant to Rule 30(b)(6), Dawn Northup, as designee of Defendant Arizona
36 Department of Corrections, ADAC is required to testify on its behalf concerning each of
37 the following matters on which examination is requested and designee has personal
38 knowledge of:

39 1. Defendant's internal response to the ACLU September 17, 2013 public
40 records request;

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- 2. Defendant's general procedures for handling public records requests;
- 3. Defendant's procedures for handling public records request seeking records concerning the lethal injection process;
- 4. Defendant's determination of the scope of the ACLU record request, and what records were subject to the request.
- 5. All steps taken to comply with the ACLU's request for records, including, all steps taken to respond to requests 1a to 5 from the ACLU records request;
- 6. All redactions of information on records released to the ACLU of Arizona; Designee should bring with her all records, documents, notes, emails, messages in written, electronic, photographic, audio or video form that may demonstrate attempts to comply with the ACLU's September 17, 2013 records request or refresh the designee's recollection concerning the matters at issue.

DATED: May 29, 2014.

ACLU FOUNDATION OF ARIZONA

By /s/ Darrell L. Hill
Darrell L. Hill
Daniel J. Pochoda

Attorneys for Plaintiff

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9 General Counsel
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10 1601 West Jefferson
Phoenix, AZ 85007

11 Charles A. Grube
12 Jeffrey Zick
13 Office of the Attorney General
14 1275 West Washington Street
Phoenix, AZ 85007

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16 /s/Gloria A. Torres
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