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Attorneys for Defendant Joseph M. Arpaio in
his official capacity as Sheriff of Maricopa
County, AZ

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Manuel de Jesus Ortega Melendres, et al.,

Plaintiff,

v.

Joseph M. Arpaio, et al.,

Defendant.

NO. CV 07-02513-PHX-GMS

**NOTICE OF PARTIAL
COMPLIANCE WITH SUBPOENA
SERVED ON AND LACK OF
AUTHORITY TO ACCOMPLISH
ADDITIONAL PRODUCTION
FROM MICHAEL ZULLO**

Counsel for Defendant Joseph M. Arpaio in his official capacity as Sheriff
of Maricopa County, Arizona, has received production from Mr. Michael Zullo that Mr.
Zullo has identified as responsive to Plaintiffs' subpoena served on Mr. Zullo. As ordered
by the Court, undersigned counsel for Sheriff Arpaio has reviewed this production for
privilege and work product and has accomplished a rolling production over the weekend.
Undersigned defense counsel provided Plaintiffs with four (4) batches of production by
Sunday evening consisting of three thousand six hundred forty-nine (3,649) pages of
documentation.

1 Undersigned defense counsel is in possession of additional material that Mr.
2 Zullo has provided as being responsive to the subpoena. Defense counsel has conducted a
3 review of this additional material, also. However, undersigned defense counsel is being
4 prohibited by Mr. Zullo from producing any additional materials due to the Fourth
5 Amendment, Fifth Amendment and due process protections that Mr. Zullo believes may
6 apply to him and the production of these additional materials. Moreover, undersigned
7 defense counsel is informed that Mr. Zullo is seeking counsel to represent him. Absent
8 further order of the Court after consideration of the concerns/protections raised by Mr.
9 Zullo, undersigned defense counsel is left with no choice but to withhold the production
10 of these additional materials that may be responsive to the Zullo subpoena.

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14 DATED this 20TH day of October, 2015.

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16 JONES, SKELTON & HOCHULI, P.L.C.

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18 By /s/ Joseph J. Popolizio
19 John T. Masterson
20 Joseph J. Popolizio
21 Justin M. Ackerman
22 2901 North Central Avenue, Suite 800
23 Phoenix, Arizona 85012
24 Attorneys for Defendant Joseph M. Arpaio
25 and the Maricopa County Sheriff's Office
26
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CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of October, 2015, I caused the foregoing document to be filed electronically with the Clerk of Court through the CM/ECF System for filing; and served on counsel of record via the Court's CM/ECF system.

/s/ Donna Hamel