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Attorneys for **Defendants Joseph M. Arpaio and  
Maricopa County Sheriff's Office**

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

Manuel de Jesus Ortega Melendres, et al.	)	NO. CV07-02513-PHX-GMS
	)	
Plaintiffs,	)	
	)	<b>DEFENDANT JOSEPH M.</b>
vs.	)	<b>ARPAIO'S MOTION FOR</b>
	)	<b>EXTENSION OF TIME TO</b>
Joseph M. Arpaio, et al.,	)	<b>DISCLOSE E-MAILS</b>
	)	
Defendants.	)	

Defendant Joseph M. Arpaio ("Defendant"), pursuant to Rule 6(b), Federal Rules of Civil Procedure, moves this Court to extend the time to September 3, 2015, to provide to the Parties "e-mails of the requested Maricopa County Sheriff's Office (MCSO) personnel from archived.pst files that are in the possession of Maricopa County." (Doc. 1208, p. 2, ll. 21-23.)

1 On July 31, 2015, this Court ordered Defendants to produce e-mails from  
2 archived.pst files on or before August 20, 2015. (Doc. 1208, p. 2, ll. 21-23.)  
3 Defendants seek an extension due to the voluminous amount of documents  
4 generated by the search terms requested by Plaintiffs' counsel and agreed upon by  
5 the parties. The search produced 16,694 documents, document ranging from one to  
6 200 pages in length. Defendants' counsel could not begin to review the 16,694  
7 documents until Tuesday, August 11, 2015, when the County's vendor created the  
8 tools and coding mechanisms necessary for document review.  
9

10 Despite defense counsel's best efforts, they have not been able to review all  
11 16,694 documents by August 20, 2015. Defense counsel sought Plaintiffs'  
12 agreement to an extension, but Plaintiffs will not agree to Defendants' request.  
13 However, Defendants' counsel will continue to make all good faith efforts to review  
14 the documents as expeditiously as possible and produce them on or before  
15 September 3, 2015, with the Court's permission.

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1 For the foregoing reasons, Defendants respectfully request the Court extend  
2 the deadline to produce the e-mails from "archived.pst" files to September 3, 2015.

3 **DATED** this 20th day of August, 2015

4 **IAFRATE & ASSOCIATES**

5  
6 By: s/Michele M. Iafrate  
7 Michele M. Iafrate  
8 Attorney for **Defendants Joseph M.**  
9 **Arpaio and Maricopa County Sheriff's**  
10 **Office**

11 **JONES SKELTON & HOCHULI, PLC**

12 By: s/Joseph J. Popolizio (w/permission)  
13 John T. Masterson  
14 Joseph J. Popolizio  
15 Diana J. Elston  
16 Justin M. Ackerman  
17 Attorneys for **Defendants Joseph M.**  
18 **Arpaio and Maricopa County Sheriff's**  
19 **Office**

20 NOTICE OF ELECTRONIC FILING AND CERTIFICATE OF SERVICE

21 I certify that I electronically filed the foregoing with the Clerk of the Court on  
22 August 20, 2015, for filing and uploading to the CM/ECF system which will send  
23 notification of such filing to all parties of record.

24 By: s/Jill Laforanara