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4 **WILLIAM J. RISNER, ESQ.**

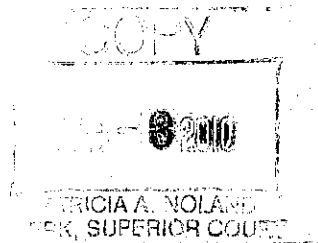
State Bar Number: 002257

5 Pima County Bar Number: 48228

6 **KENNETH K. GRAHAM, ESQ.**

State Bar Number: 007069

7 Pima County Bar Number: 21588



8
9 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
10 **IN AND FOR THE COUNTY OF PIMA**

11 **DEMOCRATIC PARTY OF PIMA**
12 **COUNTY**, a political organization,

13 Plaintiff,

14 -vs-

15 **BETH FORD**, in her official capacity as
16 **Pima County Treasurer**; and the **PIMA**
17 **COUNTY BOARD OF SUPERVISORS**, a
body politic,

Defendants.

NO. C20088876

MOTION FOR DEPOSITION OF
NON-PARTY WITNESS
Pursuant to Rule 30 (a) and 30 (b)(6)

Assigned to: Javier Chon-Lopez

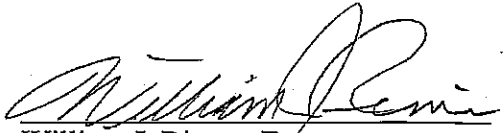
18
19 Pursuant to Rule 30 (a) and 30 (b)(6) of the Rules of Civil Procedure the
20 plaintiff requests an order permitting the deposition of a corporate representative of
21 Iron Mountain Incorporated. Many of the issues before this court relate to the Iron
22 Mountain facilities, their document copying capabilities, pricing and security.

23 The plaintiff wishes to discover or establish facts related to those issues under
24 oath.

25 The defendants have refused to agree to this deposition and hence a court order
26 is required

1 RESPECTFULLY SUBMITTED this 8~~th~~ day of February 2010.

2 **RISNER & GRAHAM**

3
4 BY: 
5 William J. Risner, Esq.
6 Attorney for Plaintiff

7 ORIGINAL of the foregoing mailed typed
8 this 8~~th~~ day of February 2010 to:

9 Ronna L. Fickbohm
10 **Slosser, Hudgins, Struse and Freund P.L.C.**
11 6750 North Oracle Road
12 Tucson, AZ 85704-5618
13 Attorney for Defendant Pima County Board of Supervisors

14 Mr. John Richardson
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19 Mary Meyer, CRS
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23 Court Reporter