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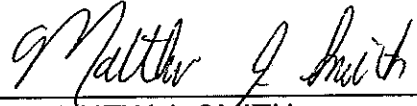
6 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**  
7 **IN AND FOR THE COUNTY OF MOHAVE**

8 STATE OF ARIZONA,  
9 Plaintiff,  
10 vs.  
11 **WARREN STEED JEFFS**  
12 Defendant.

No. CR-2007-743  
RESPONSE TO MOTION FOR  
DEPOSITION OF WITNESS  
SAM BROWER

13 COMES NOW, the State of Arizona, by the Mohave County Attorney, and  
14 hereby opposes Defendant's Motion to Depose Witness Sam Brower. Mr. Brower  
15 is a person who has not been listed as a State's witness and is not realistically  
16 going to be a witness at the trial of this matter. Any investigation Mr. Brower has  
17 done as a private investigator would be protected by the attorney-client privilege, as  
18 he has worked with the law firm of Roger and Greg Hoole who are located in Salt  
19 Lake City, Utah. He is not necessary as a witness concerning benefits given to any  
20 of the witnesses in this case because that information has already been disclosed  
21 to the defense and has been the subject of questions during interviews of other  
22 State's witnesses. For these reasons, the State requests Defendant's Motion to  
23 Depose Sam Brower be denied.

24 RESPECTFULLY SUBMITTED THIS 5th day February, 2009.

25   
MATTHEW J. SMITH  
MOHAVE COUNTY ATTORNEY

SCAN

1 A copy of the foregoing  
sent this same day by mail and e-mail to:

2 HONORABLE STEVEN F. CONN  
3 SUPERIOR COURT JUDGE

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10 By *Ben Brooks*

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