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-and-

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Nevada Bar No. 000886
Attorney for Defendant

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MOHAVE

STATE OF ARIZONA,)	NO. CR-2007-743
)	
)	REPLY TO RESPONSE TO
Plaintiff,)	MOTION FOR DEPOSITION
vs.)	OF WITNESS REBECCA MUSSER
)	
WARREN STEED JEFFS,)	
)	
Defendant.)	[Hon. Steven F. Conn]
)	


The defendant, Warren Jeffs, replies to the State's Response to Motion for Deposition of Witness Rebecca Musser. As indicated in the original motion, Ms. Musser was instructed by representatives of Texas to not discuss matters relating to Texas. As long as she is willing to answer questions relating to matters involved with Texas law enforcement -- including her role in the Texas search

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1 warrants and execution thereof, and conversations with those representatives -- in
2 a full and frank manner, counsel is agreeable to conduct another interview
3 regarding those matters and will do so in good faith. Counsel has asked the State
4 to arrange a telephonic interview in the immediate future. This Court is requested
5 to hold this motion in abeyance pending completion of that interview. If the Texas
6 authorities instruct Ms. Musser to participate in continued gamesmanship and not
7 answer questions, counsel will ask the Court to order the deposition and seek
8 sanctions. On the other hand, if Ms. Musser cooperates, this motion to depose will
9 be withdrawn. Counsel will advise the Court of the status of the motion to depose
10 after completion of the interview.
11
12
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14 RESPECTFULLY SUBMITTED this 5th day of February, 2009.

15 WRIGHT STANISH & WINCKLER

16
17 By 
18 Richard A. Wright
19 Attorney for Warren Jeffs

PICCARRETA, DAVIS PC

20
21 By 
22 Michael L. Piccarreta
23 Jefferson Keenan
24 Attorneys for Warren Jeffs
25
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1 Copy of the foregoing mailed
2 this 5th day of February, 2009, to:

3 Clerk of Mohave County Superior Court
4 401 East Spring Street
5 Kingman, AZ 86401

6 Copy of the foregoing faxed and mailed
7 this 5th day of February, 2009, to:

8 Hon. Steven F. Conn
9 Mohave County Superior Court
10 401 East Spring Street
11 Kingman, AZ 86401
12 Fax: 928-753-8938

13 Copy of the foregoing emailed
14 this 5th day of February, 2009, to:

15 Matthew J. Smith, Esq.
16 Mohave County Attorney's Office
17 315 North Fourth Street
18 P.O. Box 7000
19 Kingman, AZ 86402-7000
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