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WILLYN TINHELL
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1 PICCARRETA DAVIS PC
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3 Tucson, AZ 85701-2007
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7 -and-

8 WRIGHT STANISH & WINCKLER
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10 Las Vegas, NV 89101
11 (702) 382-4004
12 Richard A. Wright
13 Attorney for Defendant

12 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

14 IN AND FOR THE COUNTY OF MOHAVE

15	STATE OF ARIZONA,)	NO. CR-2007-953
16)	
17	Plaintiff,)	MOTION TO DEPOSE
18)	TEXAS LAW ENFORCEMENT
19	vs.)	OFFICIALS
20)	
21	WARREN STEED JEFFS,)	[Oral Argument Requested]
)	
	Defendant.)	[Hon. Steven F. Conn]
)	

22 The defendant, Warren Jeffs, by and through his counsel undersigned,
23 hereby respectfully requests this Court, pursuant to Rule 15.3 of the Arizona Rules
24 of Criminal Procedure, to order the depositions of Texas law enforcement officials
25 involved in the search and seizure of the defendant's property and property of the
26 Fundamental Church of Jesus Christ of Latter Day Saints in Eldorado, Texas.
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1 Counsel undersigned has made repeated efforts to schedule the interviews
2 of certain Texas law enforcement officials without success and these witnesses
3 have not cooperated in granting a personal interview as yet. See Rule 15.3(a)(2)
4 of the Arizona Rules of Criminal Procedure. This failure to grant personal
5 interviews is slowing the process of analysis as to all of the issues raised in the
6 motion to suppress. In addition, these Texas law enforcement officials are
7 “persons [whose] testimony is material to the case” under Rule 15.3 because they
8 have knowledge relating to the search of the FLDS Yearning for Zion Ranch in
9 Texas, including information relating to whether the issues raised in defendant’s
10 motion to suppress are “ripe” for adjudication at this time, and whether
11 cooperating Arizona law enforcement officials have been “tainted” by exposure to
12 evidence illegally seized in the raid of the Yearning for Zion Ranch.
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17 Accordingly, for the foregoing reasons, the defendant respectfully requests
18 this Court to order the deposition of the following individuals to take place at a
19 date, place, and time, mutually convenient to the parties:
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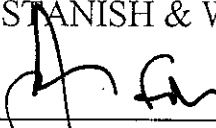
21 Sheriff David Doran (Schleicher County)
22 Texas Ranger Brooks Long
23 Deputy Sheriff John Connor (Schleicher County)
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RESPECTFULLY SUBMITTED this 16th day of October, 2008.

WRIGHT STANISH & WINCKLER

PICCARRETA DAVIS PC

By 
Richard A. Wright
Attorney for Warren Jeffs

By 
Michael L. Piccarreta
Jefferson Keenan
Attorneys for Warren Jeffs

Copy of the foregoing mailed
this 16th day of October, 2008, to:

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

Copy of the foregoing faxed and mailed
this 16th day of October, 2008, to:

Hon. Steven F. Conn
Mohave County Superior Court
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Kingman, AZ 86401
Fax: 928-753-8938

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