

1 volume of disclosure. The State has provided approximately 1,005 pages of
2 disclosure thus far, but this relates only to Mohave County Superior Court case no
3 CR-2005-718 Mr. Jeffs was recently prosecuted by the State of Utah on similar
4 charges involving some of the same individuals involved in the above-captioned
5 proceedings, and the disclosure in the Utah case exceeded 2,452 pages. It is safe
6 to assume that the volume of disclosure in the present case will be similar. In
7 addition to the sheer volume of disclosure, the present case raises very serious
8 constitutional issues concerning religious beliefs and practices. These issues
9 certainly bring the present case out of the realm of ordinary cases and will require
10 extensive research and briefing by the parties to assist the Court in making its
11 rulings on these matters
12

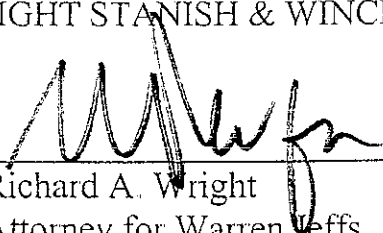
13
14
15
16 For the foregoing reasons, the defendant, Warren Jeffs, by and through his
17 undersigned attorney, hereby respectfully requests this Court, pursuant to Rule
18 8.2(a)(3)(iii) of the Arizona Rules of Criminal Procedure, to issue its order
19 designating the present case as "complex."
20

21 RESPECTFULLY SUBMITTED this 20th day of March, 2008.

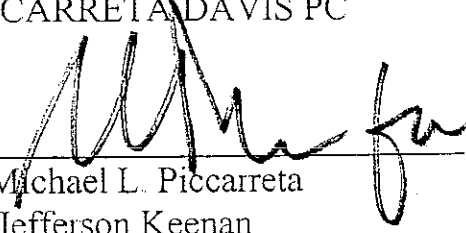
22 WRIGHT STANISH & WINCKLER

PICCARRETA DAVIS PC

23
24 By


Richard A. Wright
Attorney for Warren Jeffs

By


Michael L. Piccarreta
Jefferson Keenan
Attorneys for Warren Jeffs

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Copy of the foregoing mailed
this 20th day of March, 2008, to:

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

Copy of the foregoing faxed and mailed
this 20th day of March, 2008, to:

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

Copy of the foregoing emailed and mailed
this 20th day of March, 2008, to:

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

Timothy J. Linnins, Esq.
Office of the Attorney General
1275 W. Washington
Phoenix, AZ 85007