

Exhibit A

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649 North Fourth Avenue, First Floor
 Phoenix, Arizona 85003
 (602) 382-4078
 Kory Langhofer, Ariz. Bar No. 024722
kory@statecraftlaw.com
 Thomas Basile, Ariz. Bar. No. 031150
tom@statecraftlaw.com

Timothy A La Sota, Ariz. Bar No. 020539
TIMOTHY A. LA SOTA, PLC
 2198 East Camelback Road, Suite 305
 Phoenix, Arizona 85016
 (602) 515-2649
tim@timlasota.com

Attorneys for Plaintiffs/Contestants

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

ABRAHAM HAMADEH, *et al.*,
 Plaintiffs/Contestants,

v.

KRIS MAYES,
 Defendant/Contestee,

and

KATIE HOBBS, *et al.*,
 Defendants.

No. CV2022-015455

**PLAINTIFFS/CONTESTANTS’
 STATEMENT OF PROPOSED
 DISCOVERY**

(Assigned to the Hon. Randall Warner)

1 Pursuant to the Court’s order of November 28, 2022, the Plaintiffs/Contestants
2 herein provide a statement of their proposed discovery in these proceedings.

3 **I. Discovery from All Counties**

4 Plaintiffs would request that all fifteen counties produce or make available for
5 inspection, electronic images¹ of the following:

- 6 1. Documents Relevant to Count III. The original and duplicates of each ballot that
7 underwent duplication in connection with the November 8, 2022 general election.
- 8 2. Documents Relevant to Count IV. Unless the Court authorizes the parties to observe
9 and object to adjudications during the upcoming recount (in which case this
10 discovery request will be unnecessary), ballots on which the Arizona Attorney
11 General race in the November 8, 2022 general election was subjected to manual or
12 electronic adjudication, and records sufficient to identify the disposition of such
13 adjudications.

14 These materials can be properly secured either through traditional civil discovery
15 procedures or through an inspection authorized pursuant to A.R.S. § 16-677.²

16 **II. Discovery from Maricopa County Only**

17 Plaintiffs would propound the following requests for the production of documents to
18 the Maricopa County Board of Supervisors:

- 19 1. Documents Relevant to Count I.
- 20 a. The name, address, voter ID number, and designated political party
21 registration (if any) of each individual who was issued a provisional ballot
22 because the individual was recorded in the e-pollbook has having previously
23 “checked-in” at another vote center in the November 8, 2022 general
24 election, and documents sufficient to identify whether each such provisional
25 ballot has been tabulated.
- 26 b. The name, address, voter ID number, and designated political party
27 registration (if any) of each individual whose early ballot was voided,
28 canceled or otherwise not tabulated because the individual was recorded in

¹ Although Plaintiffs reserve the right to request access to the physical ballots if necessary, they believe at this point that the electronic images will be sufficient.

² Assuming the case proceeds, Plaintiffs intend to file a petition pursuant to Section 16-677.

1 the e-pollbook has having previously “checked-in” at a vote center in the
2 November 8, 2022 general election.

3 2. Documents Relevant to Count II. The name, address, voter ID number, and
4 designated political party registration (if any) of each individual who (a) “checked
5 in” at and did not “check out” from a vote center on November 8, 2022, (b)
6 subsequently attempted to “check in” at another vote center on November 8, 2022,
7 (c) was not issued a non-provisional ballot at second vote center, (d) did not cast a
8 provisional ballot at the second vote center, and (e) did not return an early ballot in
9 connection with the November 8, 2022.

10 3. Documents Relevant to “Check Out” Issues Generally. Records reflecting or
11 sufficient to identify, for **each** vote center operated in Maricopa County on
12 November 8, 2022, the following:

- 13 a. The number of individuals who were successfully “checked-in” at the vote
14 center;
- 15 b. The total number of ballots issued at the vote center;
- 16 c. The total number of ballots tabulated at the vote center;
- 17 d. The total number of ballots deposited in Drawer 3 at the vote center; and
- 18 e. The “Official Ballot Report” for the vote center prepared pursuant to Ariz.
19 Rev. Stat. § 16-607 and/or Chapter 9, Section VIII.B of the 2019 Elections
20 Procedures Manual.
- 21 f. The name, address, voter ID number, and designated political party
22 registration (if any) of each individual who was successfully “checked-in”
23 at the vote center;
- 24 g. The name, address, voter ID number, and designated political party
25 registration (if any) of each individual who was successfully “checked-out”
26 at the vote center;

27 In addition to being discoverable through Rule 34, the foregoing materials to be requested
28 from Maricopa County are public records within the meaning of the Arizona Public Records
Act, A.R.S. §§ 39-121, *et seq.*, and indeed *already* are the subject of pending but unfulfilled
public records requests. The Plaintiffs’ access to the foregoing documents therefore does

1 not depend solely on the availability of discovery in this proceeding, but also on Maricopa
2 County's compliance with longstanding public records laws.

3 RESPECTFULLY SUBMITTED this 29th day of November, 2022.
4

5 STATECRAFT PLLC

6 By: /s/Thomas Basile

7 Kory Langhofer

8 Thomas Basile

9 649 North Fourth Avenue, First Floor

Phoenix, Arizona 85003

10 Timothy A La Sota, SBN # 020539

11 TIMOTHY A. LA SOTA, PLC

12 2198 East Camelback Road, Suite 305

13 Phoenix, Arizona 85016

14 *Attorneys for Plaintiffs/Contestants*

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on November 29, 2022, I electronically transmitted the
3 attached document to the Clerk’s Office using the TurboCourt System for filing and
4 transmittal of a Notice of Electronic Filing to the following TurboCourt registrants:

5 D. Andrew Gaona
6 Coppersmith Brockelman PLC
7 2800 North Central Avenue, Suite 1900
8 Phoenix, Arizona 85004
9 agaona@cblawyers.com

10 Sambo (Bo) Dul
11 States United Democracy Center
12 8205 South Priest Drive, #10312
13 Tempe, Arizona 85284
14 bo@statesuniteddemocracy.org
15 *Attorneys for Defendant Arizona*
16 *Secretary of State Katie Hobbs*

17 Daniel C. Barr
18 Paul F. Eckstein
19 Alexis E. Danneman
20 Austin Yost
21 Samantha J. Burke
22 Perkins Coie LLP
23 2901 North Central Avenue
24 Suite 2000
25 Phoenix, AZ 85012
26 dbarr@perkinscoie.com
27 peckstein@perkinscoie.com
28 adanneman@perkinscoie.com
ayost@perkinscoie.com
sburke@perkinscoie.com
Attorneys for Contestee Kris Mayes

23 Joseph La Rue
24 Joe Branco
25 Karen Hartman-Tellez
26 Maricopa County Attorney’s Office
27 225 West Madison St.
28 Phoenix, AZ 85003
laruej@mcao.maricopa.gov
brancoj@mcao.maricopa.gov
hartmank@mcao.maricopa.gov

1 c-civilmailbox@mcao.maricopa.gov
2 *Attorneys for Maricopa County*

3 Celeste Robertson
4 Joseph Young
5 Apache County Attorney's Office
6 245 West 1st South
7 St. Johns, AZ 85936
8 crobertson@apachelaw.net
9 jyoung@apachelaw.net
10 *Attorneys for Defendant, Larry Noble, Apache County Recorder,*
11 *and Apache County Board of Supervisors*

12 Christine J. Roberts
13 Paul Correa
14 Cochise County Attorney's Office
15 P.O. Drawer CA
16 Bisbee, AZ 85603
17 croberts@cochise.az.gov
18 pcorrea@cochise.az.gov
19 *Attorneys for Defendant, David W. Stevens, Cochise County Recorder,*
20 *and Cochise County Board of Supervisors*

21 Bill Ring
22 Coconino County Attorney's Office
23 110 East Cherry Avenue
24 Flagstaff, AZ 86001
25 wring@coconino.az.gov
26 *Attorney for Defendant, Patty Hansen, Coconino County Recorder,*
27 *and Coconino County Board of Supervisors*

28 Jeff Dalton
29 Gila County Attorney's Office
30 1400 East Ash Street
31 Globe, AZ 85501
32 jdalton@gilacountyaz.gov
33 *Attorney for Defendant, Sadie Jo Bingham, Gila County Recorder,*
34 *and Gila County Board of Supervisors*

35 Jean Roof
36 Graham County Attorney's Office
37 800 West Main Street
38 Safford, AZ 85546
39 jroof@graham.az.gov

1 *Attorneys for Defendant, Wendy John, Graham County Recorder,*
2 *and Graham County Board of Supervisors*

3 Scott Adams
4 Greenlee County Attorney's Office
5 P.O. Box 1717
6 Clifton, AZ 85533
7 sadams@greenlee.az.gov

8 *Attorney for Defendant, Sharie Milheiro, Greenlee County Recorder,*
9 *and Greenlee County Board of Supervisors*

10 Ryan N. Dooley
11 La Paz County Attorney's Office
12 1320 Kofa Avenue
13 Parker, AZ 85344
14 rdooley@lapazcountyaz.org

15 *Attorney for Defendant, Richard Garcia, La Paz County Recorder,*
16 *and La Paz County Board of Supervisors*

17 Ryan Esplin
18 Mohave County Attorney's Office Civil Division
19 P.O. Box 7000
20 Kingman, AZ 86402-7000
21 EspliR@mohave.gov

22 *Attorney for Defendant, Kristi Blair, Mohave County Recorder,*
23 *and Mohave County Board of Supervisors*

24 Jason Moore
25 Navajo County Attorney's Office
26 P.O. Box 668
27 Holbrook, AZ 86025-0668
28 jason.moore@navajocountyaz.gov

Attorney for Defendant, Michael Sample, Navajo County Recorder,
and Navajo County Board of Supervisors

Daniel Jurkowitz
Ellen Brown
Javier Gherna
Pima County Attorney's Office
32 N. Stone #2100
Tucson, AZ 85701
Daniel.Jurkowitz@pcao.pima.gov
Ellen.Brown@pcao.pima.gov
Javier.Gherna@pcao.pima.gov

1 *Attorney for Defendant Gabriella Cázares-Kelley, Pima County Recorder, and Pima*
2 *County Board of Supervisors*

3 Craig Cameron
4 Scott Johnson
5 Allen Quist
6 Jim Mitchell
7 Pinal County Attorney's Office
8 30 North Florence Street
9 Florence, AZ 85132
10 craig.cameron@pinal.gov
11 scott.m.johnson@pinal.gov
12 allen.quist@pinal.gov
13 james.mitchell@pinal.gov

14 *Attorneys for Defendant, Dana Lewis, Pinal County Recorder,*
15 *and Pinal County Board of Supervisors*

16 Kimberly Hunley
17 Laura Roubicek
18 Santa Cruz County Attorney's Office 2150 North Congress Drive, Suite 201
19 Nogales, AZ 85621-1090
20 khunley@santacruzcountyaz.gov
21 lroubicek@santacruzcountyaz.gov
22 *Attorneys for Defendant, Suzanne Sainz, Santa Cruz County Recorder,*
23 *and Santa Cruz County Board of Supervisors*

24 Colleen Connor
25 Thomas Stoxen
26 Yavapai County Attorney's Office
27 255 East Gurley Street, 3rd Floor
28 Prescott, AZ 86301
29 Colleen.Connor@yavapaiaz.gov
30 Thomas.Stoxen@yavapaiaz.gov
31 *Attorney for Defendant, Michelle M. Burchill, Yavapai County Recorder,*
32 *and Yavapai County Board of Supervisors*

33 Bill Kerekes
34 Yuma County Attorney's Office
35 198 South Main Street
36 Yuma, AZ 85364
37 bill.kerekes@yumacountyaz.gov
38 *Attorney for Defendant, Richard Colwell, Yuma County Recorder,*
39 *and Yuma County Board of Supervisors*

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By: /s/Thomas Basile
Thomas Basile

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