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THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR MOHAVE COUNTY

Case No: S8015CV202201468

JEANNE KENTCH, an individual; TED
BOYD, an individual; ABRAHAM
HAMADEH, an individual; and REPUBLICAN
NATIONAL COMMITTEE, a federal political
party committee,

Plaintiff/Contestants,

v.

KRIS MAYES,

Defendant/Contestee,

and

KATIE HOBBS, in her official capacity as the
Secretary of State; et al.,

Defendants.

**GRAHAM COUNTY
DEFENDANTS' JOINDER
IN YAVAPAI COUNTY'S
RESPONSE IN OPPOSITION
TO PLAINTIFFS' MOTION
TO EXPEDITE DISCOVERY
AND PETITION TO
INSPECT BALLOTS**

(Assigned to Hon. Lee F.
Jantzen)

Defendants Graham County Board of Supervisors and Graham County Recorder
(collectively, the "Graham County Defendants"), by and through undersigned counsel, join in

1 Yavapai County's Response in Opposition to Plaintiffs' Motion to Expedite Discovery and
2 Petition to Inspect Ballots filed December 15, 2022 ("Yavapai County's Response").

3 Without repeating Yavapai County's arguments, Graham County shares the view that:
4 (1) Plaintiffs' Motion to Expedite Discovery would create "insurmountable practical and
5 logistical hurdles" for Graham County if granted, and (2) Plaintiffs' Petition to Inspect Ballots
6 fails to recognize the statutory limitations on inspecting ballots and overreaches in its expectation
7 that the Counties must pre-sort certain categories of ballots.

8 Graham County verified 7336 early ballots in the November 8, 2022 General Election
9 (the "General Election"), and requests that the Court take judicial notice of its Election Canvass
10 which supports this fact. See <https://www.graham.az.gov/ArchiveCenter/ViewFile/Item/398>
11 (hereinafter, "Canvass") at 19. The County simply does not have the resources (e.g., employees)
12 necessary to produce images of over 7,000 early ballots before the evidentiary hearing scheduled
13 on December 23, 2022.

14 Additionally, handling the ballot inspection in the fashion Plaintiffs have suggested is
15 contrary to A.R.S. § 16-677(A). In particular, nothing in the statute requires Graham County to
16 pre-sort all 11,006 ballots cast in the General Election to find where there is a recorded undervote
17 in the Arizona Attorney General contest, as Plaintiffs' Petition to Inspect Ballots suggests. See
18 Canvass at 4.

19 For the reasons articulated in Yavapai County's Response and those discussed above,
20 the Court should deny Plaintiffs' Motion to Expedite Discovery and Petition to Inspect Ballots.

21 RESPECTFULLY SUBMITTED this 16th day of December, 2022.

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25 By: /s/ Jean A. Roof
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1 The foregoing was e-filed via
2 AZTurboCourt on December 16, 2022.

3 Copies were e-mailed
4 December 16, 2022, to:

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