

KENT VOLKMER
PINAL COUNTY ATTORNEY
SBN #00003800
James I. Mitchell, SBN 029771
James.mitchell@pinal.gov
Craig Cameron, SBN 015679
Craig.cameron@pinal.gov
Deputy County Attorney
PO Box 887
Florence, AZ 85132
(520) 866-5579
Attorneys for Pinal County Recorder
and Board of Supervisors

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

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

Plaintiffs/Contestants,

vs.

KRIS MAYES,

Defendant/Contestee,

and

KATIE HOBBS, in her official capacity as the
Secretary of State; LARRY NOBLE, in his
official capacity as the Apache County
Recorder; APACHE COUNTY BOARD OF
SUPERVISORS, in their official capacity;
DAVID W. STEVENS, in his official capacity
as Cochise County Recorder; COCHISE
COUNTY BOARD OF SUPERVISORS, in
their official capacity; PATTY HANSEN, in
her official capacity as the Coconino County
Recorder; COCONINO COUNTY BOARD
OF SUPERVISORS, in their official capacity;
SADIE JO BINGHAM, in her official capacity
as Gila County Recorder; GILA COUNTY
BOARD OF SUPERVISORS, in their official

Case No. CV2022-01468

PINAL COUNTY DEFENDANTS'
RESPONSE TO PLAINTIFFS'
MOTION FOR A NEW TRIAL

(Assigned to the Honorable Lee F.
Jantzen)

1 capacity; WENDY JOHN, in her official
2 capacity as Graham County Recorder;
3 GRAHAM COUNTY BOARD OF
4 SUPERVISORS, in their official capacity;
5 SHARIE MILHEIRO, in her official capacity
6 as Greenlee County Recorder; GREENLEE
7 COUNTY BOARD OF SUPERVISORS, in
8 their official capacity; RICHARD GARCIA, in
9 his capacity as the La Paz County Recorder;
10 LA PAZ COUNTY BOARD OF
11 SUPERVISORS, in their official capacity;
12 STEPHEN RICHER, in his official capacity as
13 the Maricopa County Recorder; MARICOPA
14 COUNTY BOARD OF SUPERVISORS, in
15 their official capacity; KRISTI BLAIR, in her
16 official capacity as the Mohave County
17 Recorder; MOHAVE COUNTY BOARD OF
18 SUPERVISORS, in their official capacity;
19 MICHAEL SAMPLE, in his official capacity
20 as Navajo County Recorder; NAVAJO
21 COUNTY BOARD OF SUPERVISORS, in
22 their official capacity; GABRIELLA
23 CAZARES-KELLY, in her official capacity as
24 the Pima County Recorder; PIMA COUNTY
BOARD OF SUPERVISORS, in their official
capacity; DANA LEWIS, in her official
capacity as the Pinal County Recorder; PINAL
COUNTY BOARD OF SUPERVISORS, in
their official capacity; SUZANNE SAINZ, in
her official capacity as the Santa Cruz County
Recorder; SANTA CRUZ COUNTY BOARD
OF SUPERVISORS, in their official capacity;
MICHELLE M. BURCHILL, in her official
capacity as the Yavapai County Recorder;
YAVAPAI COUNTY BOARD OF
SUPERVISORS, in their official capacity;
RICHARD COLWELL, in his official capacity
as the Yuma County Recorder; and YUMA
COUNTY BOARD OF SUPERVISORS, in
their official capacity,

Defendants.

Pinal County takes no position regarding the ultimate merits of Plaintiff/Contestants
Motion for a New Trial. As such, Pinal County is of the view it is a nominal party at best having

1 fully complied with the State's mandated recount process and as stated in
2 Plaintiff/Contestants' Motion at page 12, "Pinal County did it right." Therefore, Pinal County
3 cannot add anything new to this matter beyond what was previously provided in the recount
4 and cited by Plaintiff/Contestants in its Motion for a New Trial. However, Pinal County by
5 taking this position is not waiving or intending to waive any objections as to the relevance,
6 materiality, privilege, or admissibility of any information requested, produced or identified
7 related to this matter.

8 RESPECTFULLY SUBMITTED this 12th day of January, 2023.

9 KENT VOLKMER
10 PINAL COUNTY ATTORNEY

11
12 /s/ James Mitchell
13 James Mitchell
Deputy County Attorney

14 The foregoing was e-filed via AZTurboCourt
15 with the Clerk of the Superior Court of Mohave
County on January 12th, 2023

16 COPY of the foregoing was emailed this
17 12th day of January, 2023 to:

18 David A. Warrington
19 Gary Lawkowski
DHILLON LAW GROUP, INC.
20 2121 Eisenhower Avenue, Suite 608
Alexandria, VA 22314
DWarrington@dhillonlaw.com
21 GLawkowski@dhillonlaw.com
Timothy A La Sota,
22 TIMOTHY A. LA SOTA, PLC
2198 East Camelback Road, Suite 305
23 Phoenix, Arizona 85016
tim@timlasota.com
24 Attorneys for Plaintiffs/Contestants

Celeste Robertson
Joseph Young
Apache County Attorney's Office
245 West 1st South
St. Johns, AZ 85936
crobertson@apachelaw.net
jyoung@apachelaw.net
Attorneys for Defendant, Larry Noble,
Apache County Recorder,
and Apache County Board of
Supervisors

1 Christine J. Roberts
2 Paul Correa
3 Cochise County Attorney's Office
4 P.O. Drawer CA
5 Bisbee, AZ 85603
6 croberts@cochise.az.gov
7 pcorrea@cochise.az.gov
8 Attorneys for Defendant, David W.
9 Stevens, Cochise County Recorder,
10 and Cochise County Board of
11 Supervisors

12 Bill Ring
13 Coconino County Attorney's Office
14 110 East Cherry Avenue
15 Flagstaff, AZ 86001
16 wring@coconino.az.gov
17 Attorney for Defendant, Patty Hansen,
18 Coconino County Recorder,
19 and Coconino County Board of
20 Supervisors

21 Jeff Dalton
22 Gila County Attorney's Office
23 1400 East Ash Street
24 Globe, AZ 85501
jdalton@gilacountyaz.gov
Attorney for Defendant, Sadie Jo
Bingham, Gila County Recorder,
and Gila County Board of Supervisors

Jean Roof
Graham County Attorney's Office
800 West Main Street
Safford, AZ 85546
jroof@graham.az.gov
Attorneys for Defendant, Wendy John,
Graham County Recorder,
and Graham County Board of
Supervisors

Rob Gilliland
Greenlee County Attorney's Office
P.O. Box 1717
Clifton, AZ 85533
rgilliland@greenlee.az.gov
Attorney for Defendant, Sharie
Milheiro, Greenlee County Recorder,
and Greenlee County Board of
Supervisors

Ryan N. Dooley
La Paz County Attorney's Office
1320 Kofa Avenue
Parker, AZ 85344
rdooley@lapazcountyaz.org
Attorney for Defendant, Richard
Garcia, La Paz County Recorder,
and La Paz County Board of
Supervisors

Ryan Esplin
Mohave County Attorney's Office Civil
Division
P.O. Box 7000
Kingman, AZ 86402-7000
EspliR@mohave.gov
Attorney for Defendant, Kristi Blair,
Mohave County Recorder,
and Mohave 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
Attorney for Defendant Gabriella
Cázares-Kelley, Pima County
Recorder, and Pima
County Board of Supervisors

1 Kimberly Hunley
2 Laura Roubicek
3 Santa Cruz County Attorney's Office
4 2150 North Congress Drive, Suite 201
5 Nogales, AZ 85621-1090
6 khunley@santacruzcountyaz.gov
7 lroubicek@santacruzcountyaz.gov
8 Attorneys for Defendant, Suzanne
9 Sainz, Santa Cruz County Recorder,
10 and Santa Cruz County Board of
11 Supervisors

12 Thomas Stoxen
13 Colleen Conner
14 Michael J. Gordon
15 Yavapai County Attorney's Office
16 255 Gurley St.
17 Prescott, AZ 86201
18 Attorneys for Defendants Yavapai
19 County Board of Supervisors and
20 Michelle Burchill,
21 Yavapai County Recorder

22 By: /s/ Kelly Pile

Bill Kerekes
Yuma County Attorney's Office
198 South Main Street
Yuma, AZ 85364
bill.kerekes@yumacountyaz.gov
Attorney for Defendant, Richard
Colwell, Yuma County Recorder,
and Yuma County Board of
Supervisors

D. Andrew Gaona
Coppersmith Brockelman PLC
2800 N. Central Avenue, Suite 1900
Phoenix, AZ 85004
agaona@cblawyers.com
Sambo (Bo) Dul
States United Democracy Center
8205 S. Priest Drive, #10312
Tempe, AZ 85284
bo@statesuniteddemocracy.org
Attorneys for Secretary of State

RETRIEVED FROM DEMOCRACYDOCKET.COM