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21	IN AND FOR THE COUNTY OF MARICOPA	
22	KARI LAKE,	No. CV2022-095403
23 24	Contestant/Petitioner,	MARICOPA COUNTY DEFENDANTS' DISCLOSURE OF EXPERTS
25	VS.	(Expedited Election Matter)
23 26	KATIE HOBBS, et al.,	(Honorable Peter Thompson)
20 27	Defendants.	• '
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DIVISION Street		

MARICOPA COUNTY ATTORNEY'S OFFICE CIVIL SERVICES DIVISION 225 WEST MADISON STREET PHOENIX, ARIZONA 85003 Pursuant to this Court's Minute Entry dated May 8, 2023, the Maricopa County
Defendants (the "County"), by and through undersigned counsel, hereby disclose the
following information.

The County does not intend to call any expert witnesses to opine at trial scheduled 4 for May 17-19, 2023. However, in an abundance of caution, the County discloses that it 5 6 intends to call Director of Elections Reynaldo Valenzuela as a fact witness. Mr. Valenzuela 7 has specialized training, knowledge, and expertise in election administration beyond that of many, and perhaps most, other fact witnesses in election-related litigation. Among other 8 9 things, Mr. Valenzuela is a Certified Elections Registration Administrator ("CERA"), has been a Certified Election Officer since 1996, and has over thirty years of experience in 10 various aspects of election administration in Maricopa County. The County anticipates Mr. 11 Valenzuela will provide testimony regarding his personal knowledge of facts relevant to the 12 claims and defenses made in this case, including but not limited to the County's early voting 13 procedures, its signature verification procedures, its related training, and the signature 14 verification conducted during the 2022 general election. 15

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RESPECTFULLY SUBMITTED this 11th day of May, 2023.

RACHEL H. MITCHELL MARICOPA COUNTY ATTORNEY

- BY: <u>/s/Joseph E. La Rue</u> Thomas P. Liddy Joseph J. Branco Joseph E. La Rue Karen J. Hartman-Tellez Jack L. O'Connor Sean M. Moore Rosa Aguilar Deputy County Attorneys
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1	ORIGINAL of the foregoing E-FILED
2	this 11th day of May, 2023, with AZTURBOCOURT, and copies e-served / emailed to:
3	AZTORBOCOURT, and copies e-served / emaned to.
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