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Attorneys for Defendant

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

Arizona Green Party; Dr. Jill Stein; ) Case No.: 2:16-cv-02027-PHX-ESW  
Angel Torres; and Linda Macias, )

Plaintiffs, )

v. )

Michele Reagan, in her official capacity )  
as Secretary of State of Arizona, )

Defendant. )

) **STIPULATION**

1 The parties stipulate and agree to the following:

- 2 1. Plaintiff the Arizona Green Party is a recognized party in Arizona pursuant to  
3 A.R.S. § 16-801.
- 4 2. Celeste Castorena, Angela Dixon, Betty Dixon, Theresa Gallagher, Antonio  
5 Macias, Linda Macias, Betty McMurrin, Elisa Olea, Richard Scott, Angel Torres,  
6 and Geneva Warner are the presidential electors the Arizona Green Party selected  
7 for the 2016 Presidential Election.
- 8 3. A.R.S. § 16-311(E) and A.R.S. § 16-344 require the submission of nomination  
9 papers for the office of presidential elector by 5:00pm on the last date of filing.
- 10 4. For the 2016 election cycle, the last date to file under A.R.S. § 16-311(E) was  
11 June 1, 2016.
- 12 5. The Secretary's Office sent reminders to the Arizona Green Party on June 1, 2016  
13 that it was the deadline for presidential elector filings. The Arizona Green Party  
14 did not submit their nomination papers on June 1, 2016, but attempted to cure their  
15 error after the deadline passed. Because the statutory deadline had passed, the  
16 Secretary's Office acknowledged the attempted filing but did not accept the late-  
17 filed nomination papers in fulfillment of A.R.S. § 16-311(E)'s requirement.
- 18 6. If the Arizona Green Party's nomination papers are not accepted, the Green Party  
19 candidate for president will not appear on the general election ballot.
- 20 7. In this instance, the acceptance of the Arizona Green Party's nomination papers  
21 will not prejudice the preparation of the 2016 general election ballot.
- 22 8. The parties agree that the Court may therefore enter an injunction enjoining the  
23 Secretary from refusing to accept the nomination papers of Celeste Castorena,  
24 Angela Dixon, Betty Dixon, Theresa Gallagher, Antonio Macias, Linda Macias,  
25 Betty McMurrin, Elisa Olea, Richard Scott, Angel Torres, and Geneva Warner  
26 (the "Green Party Electors") and ordering the Secretary to include the names of  
27 the Green Party electors and the presidential and vice presidential candidates of  
28 the Green Party in its notification to the counties of the State of Arizona of the

1 presidential candidates and presidential electors to be included on the ballot for the  
2 November 8, 2016 general election.

3 9. Each party shall be responsible for its own fees and costs.

4 10. A proposed order is attached.

5 Respectfully submitted this 12th day of July, 2016.  
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7  
8 Mark Brnovich  
9 Attorney General

BARNES LAW

10 s/ James Driscoll-MacEachron  
11 James Driscoll-MacEachron

s/ Julia Damron  
12 Robert E. Barnes, Esq.

13 Assistant Attorney General  
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15 Julia Damron, Esq.  
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1 I certify that I electronically transmitted the attached document to the Clerk's Office  
2 using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to  
3 the following, if CM/ECF registrants, and sent via electronic mail a copy of same if non-  
registrants, this 12th day of July, 2016:

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