

DISTRICT COURT, CITY AND COUNTY OF
DENVER, COLORADO

Court Address: 1437 Bannock Street
Denver, Colorado 80202

DOMINICK MORENO, CHRISTINE LE LAIT,
WILLIAM N. PATTERSON, RITA MAHONEY,
ROGER CLARK, KRISTI MATSUNAKA, and MIKEL
WHITNEY;

KATHRYN H. HALL, DANNY E. STROUD, DICK R.
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WILLIAMS, MARK BAISLEY, and SHIRLEY J. SEITZ;

COLORADO LATINO FORUM and COLORADO
HISPANIC BAR ASSOCIATION;

THE CITY OF AURORA and MAYOR
EDWARD J. TAUER, in his official capacity as Mayor of
the City of Aurora;

BOARD OF COUNTY COMMISSIONERS OF THE
COUNTY OF DOUGLAS, STATE OF COLORADO;
and

BILL THIEBAUT,

Plaintiffs,

v.

SCOTT GESSLER, in his official capacity as Colorado
Secretary of State,

Defendant.

Attorneys for Plaintiffs Colorado Latino Forum and
Colorado Hispanic Bar Association:
Regina M. Rodriguez, #17963
John D. Shively, #13941
James R. Spaanstra, #9516
Thomas W. Carroll, #41438

Case Number: 11CV3461;
consolidated with Case No:
11CV3463

Ctrm: 209

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PLAINTIFFS COLORADO LATINO FORUM and COLORADO HISPANIC BAR ASSOCIATION'S SUPPLEMENTAL RULE 26(a)(1) DISCLOSURES

Plaintiffs Colorado Latino Forum and the Colorado Hispanic Bar Association (together, the “Hispanic Plaintiffs”), through their undersigned counsel, Faegre & Benson LLP and MALDEF, make the following supplemental initial disclosures pursuant to Colorado Rule of Civil Procedure 26(a)(1) based on the information reasonably available to the Hispanic Plaintiffs at this time. These disclosures are made for the sole purpose of complying with Colorado Rule of Civil Procedure 26(a) and do not constitute a waiver of any of the Hispanic Plaintiffs’ rights, objections, or privileges that they may be legally entitled to assert in connection with discovery, trial, or other proceedings in this action, including their right to assert applicable privileges, to assert the First Amendment Privilege, to protect confidential information, and otherwise to be protected from objectionable discovery as provided in the Colorado Rules of Civil Procedure. Any disclosure of privileged materials is unintended.

These supplemental disclosures are based on the Hispanic Plaintiffs’ current knowledge. The documents set forth are documents currently in the Hispanic Plaintiffs’ possession, custody, or control, which the Hispanic Plaintiffs’ counsel has been able to review prior to making disclosures. The Hispanic Plaintiffs plan to supplement, modify and amend these disclosures, as necessary, based upon subsequently acquired or available knowledge or documents.

B. DOCUMENTS

In addition to the categories of documents already disclosed, the following are categories of documents within the Hispanic Plaintiff's possession, custody, or control that the Hispanic Plaintiffs may use to support their claims or defenses:

1. A proposed statewide map of Colorado congressional boundaries titled the "Hispanic Map." A copy of the map in .pdf format is attached as Exhibit A. A copy of the map enhanced to show the Denver metropolitan area in .pdf format is attached as Exhibit B.
2. Block Assignment Files and Shape Files corresponding to the Hispanic Map. Such files will be served on all parties via e-mail.

Respectfully submitted this 2nd day of September, 2011.



s/ Thomas W. Carroll

Regina M. Rodriguez, #17963

John D. Shively, #13941

James R. Spaanstra, #9516

Thomas W. Carroll, #41438

FAEGRE & BENSON LLP

Nina Perales, TX Atty # 24005046

Rebecca M. Couto, CA Atty #248019

MALDEF

Counsel for Plaintiffs Colorado Latino Forum and
Colorado Hispanic Bar Association

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of September, 2011, a true and correct copy of the **PLAINTIFFS COLORADO LATINO FORUM and COLORADO HISPANIC BAR ASSOCIATION'S SUPPLEMENTAL RULE 26(a)(1) DISCLOSURES** was served via LexisNexis File & Serve on the following:

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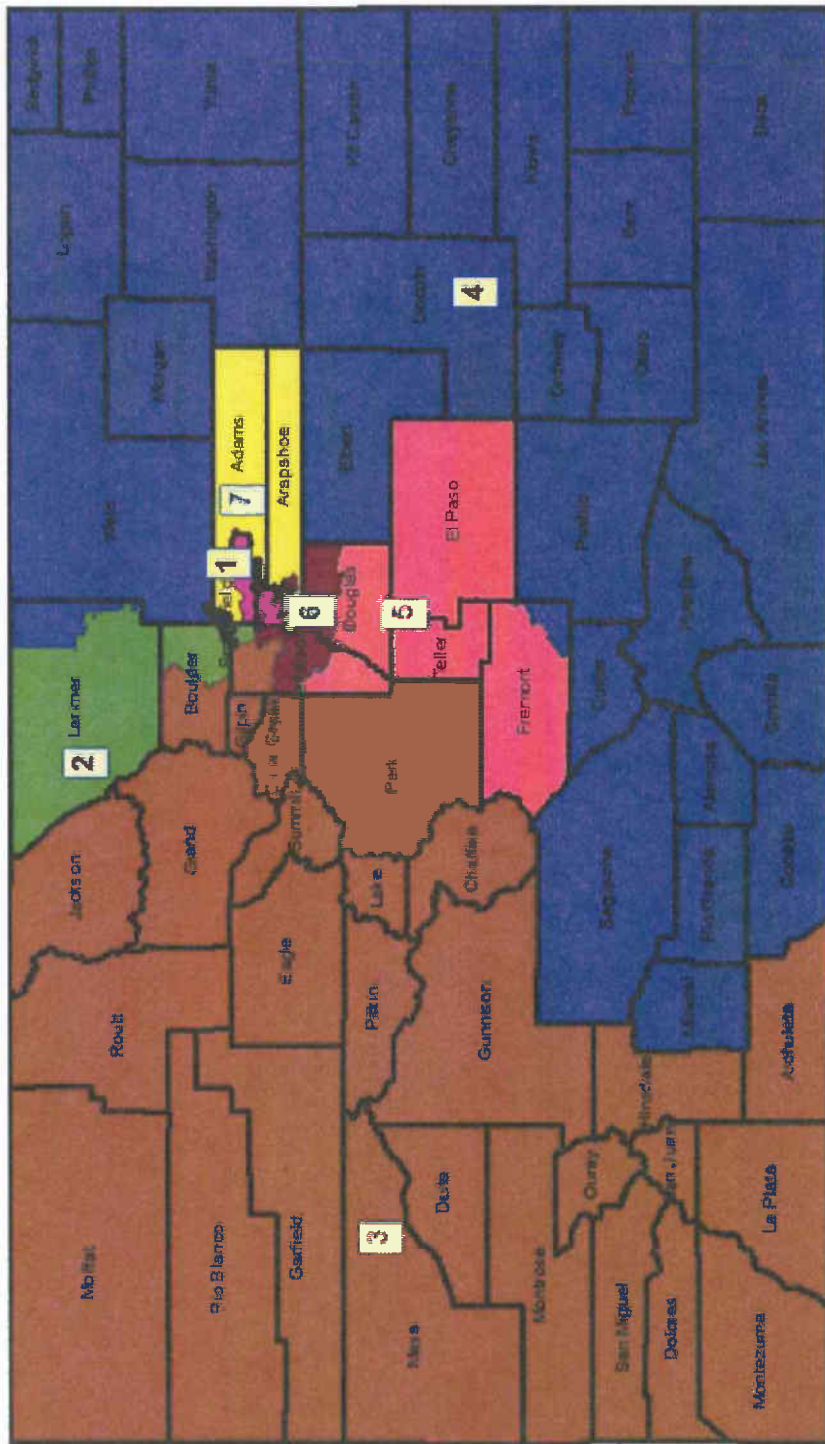
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s/ Sonja Beamon
Sonja Beamon, Legal Secretary

This document was e-filed with the Court through the Lexis/Nexis File and Serve electronic filing procedures, under C.R.C.P. 121(c), § 1-26. As required by those rules, the original signed copy of this document is on file with Faegre & Benson, LLP.

EXHIBIT A



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EXHIBIT
A

EXHIBIT B

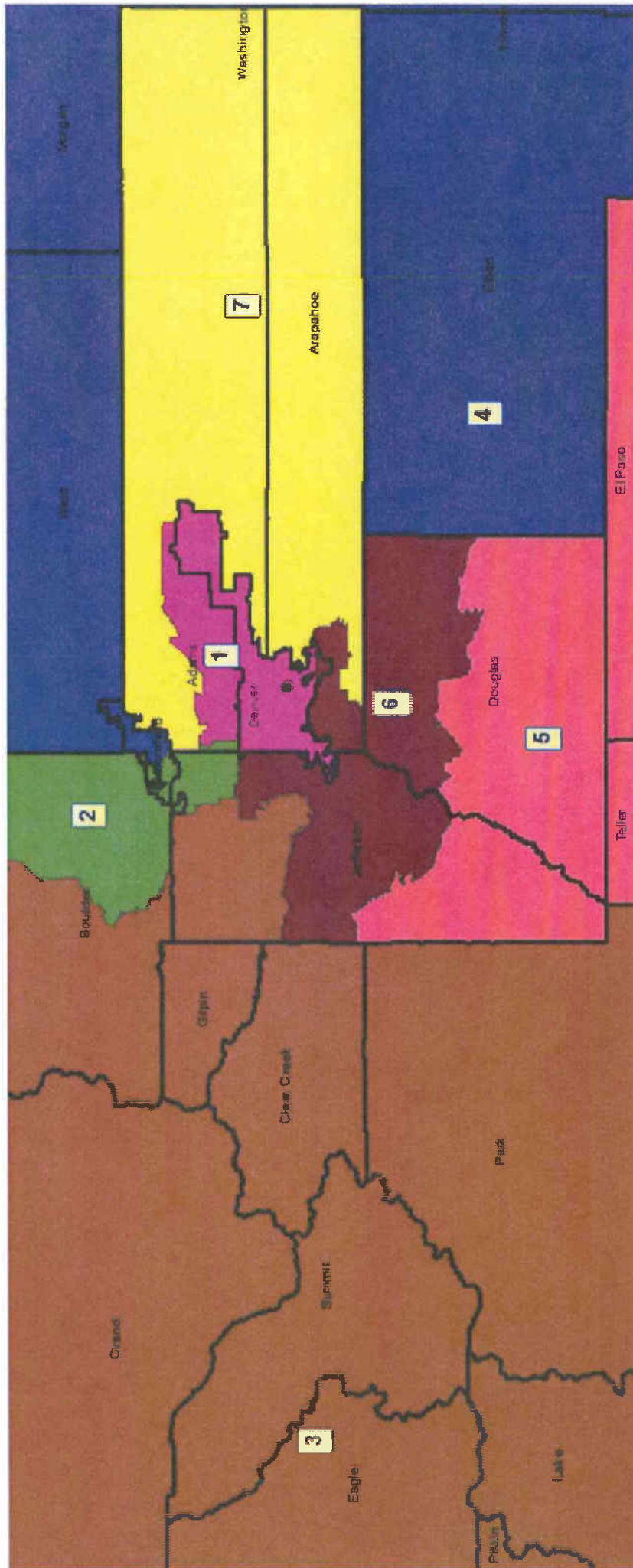


EXHIBIT
B