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

\_\_\_\_\_  
)  
League of United Latin American )  
Citizens Arizona; Arizona Students' )  
Association, )  
)  
Plaintiffs, )  
)  
v. )  
)  
Michele Reagan, in her official )  
capacity as Secretary of State of Arizona;) )  
Adrian Fontes, in his official )  
capacity as Maricopa County Recorder )  
)  
Defendants. )  
\_\_\_\_\_)

No. 2:17-cv-04102-DGC

**DECLARATION IN SUPPORT OF  
MOTION TO COMPEL  
COMPLIANCE WITH CONSENT  
DECREE**

1. I, Danielle Lang, declare that I am Senior Legal Counsel at Campaign Legal Counsel, and counsel to Plaintiffs LULAC-Arizona and Arizona Students' Association. I submit this declaration in support of Plaintiffs' Motion to Compel Compliance with the Consent Decree in the above-captioned case. The following facts are within my personal knowledge, and if called and sworn as a witness, I could and would testify competently to them.

2. On July 18, 2018, I received an email from Defendant's counsel Joseph La Rue forwarding to me the guidance sent by the Secretary of State's office to all county recorders

1 pursuant to the Consent Decree in this case. A true and correct copy of that email and all its  
2 attachments is attached as Exhibit A herein.

3  
4 3. Between July 18, 2018 and October 11, 2018, Defendant’s counsel Joseph La Rue and I  
5 exchanged emails regarding the DPOC submission form required by the Consent Decree and  
6 specifically the need for a DPOC submission form for prospective voters with “F-type” licenses.

7 A true and correct copy of that email correspondence is attached as Exhibit B herein.  
8  
9

10 November 12, 2018

/s/ Danielle Lang

Danielle Lang

*Attorney for Plaintiffs*