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MIRLENE HUBBELL
SUPERIOR COURT CLERK

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2 145 South Sixth Avenue
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5 Michael L. Piccarreta
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7 Attorney for Defendant

-and-

8 WRIGHT STANISH & WINCKLER
9 300 S. Fourth Street, Suite 701
10 Las Vegas, NV 89101
11 (702) 382-2004
12 Attorney for Defendant

13 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
14 IN AND FOR THE COUNTY OF MOHAVE

15	STATE OF ARIZONA,)	NO CR-2007-743
16)	
17	Plaintiff,)	DEFENDANT JEFFS' MOTION FOR
18)	DESIGNATION OF COMPLEX CASE
19	vs)	
20)	
21	WARREN STEED JEFFS,)	[Oral Argument Requested]
22)	
23	Defendant.)	[Hon. Steven F. Conn]
24)	

25 The defendant, Warren Jeffs, by and through his undersigned attorney,
26 hereby respectfully requests this Court, pursuant to Rule 8.2(a)(3)(iii) of the
27 Arizona Rules of Criminal Procedure, to issue its order designating the present
28 case as "complex." Rule 8.2(a)(3)(iii) extends the otherwise applicable time limit
for trial and sets a limit of "270 days from arraignment" for "[a]ny complex cases
as determined by a written factual finding by the court."

Mr. Jeffs submits that the present case is "complex" due to the sheer

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1 volume of disclosure. The State has provided approximately 1,005 pages of
2 disclosure thus far, but this relates only to Mohave County Superior Court case no.
3 CR-2005-718. Mr. Jeffs was recently prosecuted by the State of Utah on similar
4 charges involving some of the same individuals involved in the above-captioned
5 proceedings, and the disclosure in the Utah case exceeded 2,452 pages. It is safe
6 to assume that the volume of disclosure in the present case will be similar. In
7 addition to the sheer volume of disclosure, the present case raises very serious
8 constitutional issues concerning religious beliefs and practices. These issues
9 certainly bring the present case out of the realm of ordinary cases and will require
10 extensive research and briefing by the parties to assist the Court in making its
11 rulings on these matters.
12

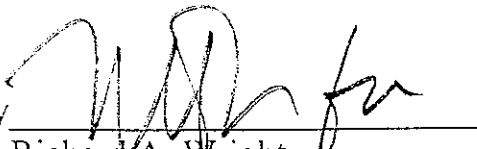
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14
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16 For the foregoing reasons, the defendant, Warren Jeffs, by and through his
17 undersigned attorney, hereby respectfully requests this Court, pursuant to Rule
18 8.2(a)(3)(iii) of the Arizona Rules of Criminal Procedure, to issue its order
19 designating the present case as "complex."
20

21 RESPECTFULLY SUBMITTED this 20th day of March, 2008.

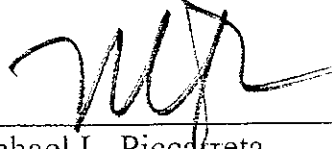
22 WRIGHT STANISH & WINCKLER

PICCARRETA DAVIS PC

23
24 By


Richard A. Wright
Attorney for Warren Jeffs

By


Michael L. Piccarreta
Jefferson Keenan
Attorneys for Warren Jeffs

1 Copy of the foregoing mailed
2 this 20th day of March, 2008, to:

3 Clerk of Mohave County Superior Court
4 401 East Spring Street
5 Kingman, AZ 86401

6 Copy of the foregoing faxed and mailed
7 this 20th day of March, 2008, to:

8 Hon. Steven F. Conn
9 Mohave County Superior Court
10 401 East Spring Street
11 Kingman, AZ 86401
12 Fax: 928-753-8938

13 Copy of the foregoing emailed and mailed
14 this 20th day of March, 2008, to:

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