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Attorneys for Defendant

-and-

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Richard A. Wright
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Attorney for Defendant

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MOHAVE

STATE OF ARIZONA,

NO. CR-2007-953

Plaintiff,

REPLY TO RESPONSE TO
MOTION FOR DEPOSITION
OF WITNESS REBECCA MUSSER

vs.

WARREN STEED JEFFS,

Defendant.

[Hon. Steven F. Conn]

The defendant, Warren Jeffs, replies to the State's Response to Motion for Deposition of Witness Rebecca Musser. As indicated in the original motion, Ms. Musser was instructed by representatives of Texas to not discuss matters relating to Texas. As long as she is willing to answer questions relating to matters involved with Texas law enforcement -- including her role in the Texas search

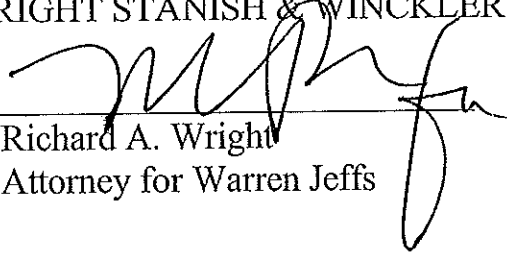
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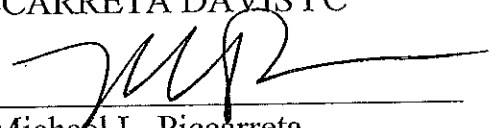
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warrants and execution thereof, and conversations with those representatives -- in a full and frank manner, counsel is agreeable to conduct another interview regarding those matters and will do so in good faith. Counsel has asked the State to arrange a telephonic interview in the immediate future. This Court is requested to hold this motion in abeyance pending completion of that interview. If the Texas authorities instruct Ms. Musser to participate in continued gamesmanship and not answer questions, counsel will ask the Court to order the deposition and seek sanctions. On the other hand, if Ms. Musser cooperates, this motion to depose will be withdrawn. Counsel will advise the Court of the status of the motion to depose after completion of the interview.

RESPECTFULLY SUBMITTED this 5th day of February, 2009.

WRIGHT STANISH & WINCKLER
By 
Richard A. Wright
Attorney for Warren Jeffs

PICCARRETA DAVIS PC
By 
Michael L. Piccarreta
Jefferson Keenan
Attorneys for Warren Jeffs

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Copy of the foregoing mailed
this 5th day of February, 2009, to:

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

Copy of the foregoing faxed and mailed
this 5th day of February, 2009, to:

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

Copy of the foregoing emailed
this 5th day of February, 2009, to:

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