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Scott M. McNair
Phoenix, Arizona

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

SCOTT M. MCNAIR
Plaintiff,

V.

County of Maricopa, Kenneth Medlin, Terry
Peterson, and Jennipher Ramsey
Defendants,

CASE No. CIV-03-2119-PHX -ROS

**PLAINTIFF’S INITIAL DISCLOSURE
STATEMENT AND NOTICE OF SUCH**

Assigned to the Hon. Roslyn O. Silver

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Plaintiff Scott McNair does hereby submit the following as his initial disclosure statement.

**I. NAME AND ADDRESS OF EACH INDIVIDUAL LIKELY TO HAVE
DISCOVERABLE INFORMATION RELEVANT TO THE DISPUTED FACTS IN
THE PARTIES PLEADINGS:**

None at this time. The Plaintiff intends to call a number of Maricopa County employees as witnesses. But, as the Defendants have maintained a two-year campaign of total obstruction of discovery, the full names and addresses of such are unknown and therefore not available at this time. Plaintiff reserves the right to supplement disclosure of witnesses pending a proper disclosure by the Defendants.

**II. DESCRIPTION OF EACH AND EVERY DOCUMENT, DATA COMPILATION OR
TANGIBLE THING IN THE POSSESSION, CUSTODY, OR CONTROL OF THE
PLAINTIFF THAT IS RELEVANT TO THE DISPUTED FACTS ALLEGED IN THE
PLEADINGS.**

1 In keeping with the desires and directive of the Honorable Roslyn O. Silver to maintain an “electronic
2 courtroom”, the Plaintiff has included a CD-ROM with a detailed index and true and accurate images of
3 those documents currently in the Plaintiff’s possession. Included are two hundred and forty-six
4 documents. The Plaintiff shall supply a substantial supplementary disclosure of additional documents in
5 the near future.

6
7 This disclosure is made pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure.

8
9 RESPECTFULLY SUBMITTED this 28th day of MAY 2004.

10
11 By _____

12 Scott M. McNair, Plaintiff Pro Per

13
14
15 FILED and HAND-DELIVERED this 28th day of MAY 2004.

16
17 ORIGINAL and COPY FILED (excluding CD-ROM) with:

18 Clerk of the Court
19 United States District Court, District of Arizona
20 Sandra Day O'Connor U.S. Courthouse
401 W. Washington Street, Suite 130
Phoenix, AZ 85003-2118

21
22
23 COPY of the forgoing (including CD-ROM) HAND-DELIVERED to:

24 Office of the Maricopa County Attorney
25 Attn: Dan Brenden
26 222 North Central Avenue, Suite 1100
Phoenix, Arizona 85004
(Counsel for Defendants: Maricopa County, Medlin, Peterson, & Ramsey)