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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, et al,
Defendants,

No. CV-03-2119-PHX-NVW

**ERRATUM FOR PLAINTIFF’S
MOTION TO DENY CONSIDERATION OF
DEFENDANTS’ SUMMARY JUDGMENT REPLY**

Assigned to the Hon. Neil V. Wake

I. PLEA FOR LENIENCY AND WAIVER OF FORMAL REQUIREMENTS

In that the Plaintiff (McNair) is neither represented by counsel nor had any formal legal training, he does hereby request leniency from the Court for the form and content of this pleading. Plaintiff also requests the Court to waive and/or modify any formal procedural requirements in order to insure him due process and equitable justice, and to insure that a fair and just determination can be made. (“Pro se litigants’ pleadings are not to be held to the same high standards of perfection as lawyers.”¹)

...

¹ Haines V. Kerner, 92 S.Ct. 594; Jenkins V. McKeithen, 395 US 411, 421 (1969); Picking V. Penna. Rwy. Co. 151 F.2d 240; Puckett V. Cox, 456 F.2d 233.)

1 **II. ERRATUM**

2 On October 21 2005, Plaintiff filed a “*Motion To Deny Consideration Of Defendants’ Summary*
3 *Judgment Reply*”. That pleading contained an error in its citation of the number of attorneys
4 employed by the Maricopa County Attorney’s Office (MCAO).

5 Page 3 line 9 of that pleading reads:

6 “...government agency consisting of over **nine hundred** attorneys.”

7 It should be corrected to read:

8 “...government agency consisting of **hundreds** of attorneys.”

9
10 Plaintiff sincerely apologizes to the court and all other parties for the error of this misquotation.
11 He submits this erratum so that the court is aware that he meant no misrepresentation of any material
12 facts before it.

13 The quotation was based upon an exhibit included in the pleading which was obtained directly
14 from the website of the MCAO. Due to defendants’ ongoing campaign of obstruction with all
15 discovery and disclosure on any subject (unabated by this court), the actual number of attorneys
16 employed by the MCAO is unknown. While the actual number of attorneys employed by the MCAO
17 may not equal “nine-hundred”, no evidence exists to suggest that this misquotation is in any manner
18 prejudicial to defendants.

19
20 RESPECTFULLY SUBMITTED this 24th day of OCTOBER 2005.

21
22 By _____
23 Scott M. McNair, Plaintiff Pro Se

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ORIGINAL and COPY FILED this day with:

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

COPY of the forgoing HAND-DELIVERED this same day to:

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

COPY of the forgoing MAILED this same day to

Jones, Skelton & Hochuli, P.L.C.
Attn: Eileen Dennis GilBride
2901 N. Central Avenue, Suite 800,
Phoenix, Arizona 85012,