

## Jack O'Connor (MCAO)

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**From:** Jack O'Connor (MCAO)  
**Sent:** Tuesday, January 17, 2023 6:43 PM  
**To:** Bryan Blehm  
**Cc:** Joseph LaRue (MCAO)  
**Subject:** Re: CV2022-053499

She is not. She is not employed by the Elections Department or Maricopa County.

Thanks,

Jack O'Connor

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**From:** Bryan Blehm <[bryan@blehmlegal.com](mailto:bryan@blehmlegal.com)>  
**Sent:** Tuesday, January 17, 2023 4:56:29 PM  
**To:** Jack O'Connor (MCAO) <[oconnorj@mcao.maricopa.gov](mailto:oconnorj@mcao.maricopa.gov)>  
**Cc:** Joseph LaRue (MCAO) <[laruej@mcao.maricopa.gov](mailto:laruej@mcao.maricopa.gov)>  
**Subject:** Re: CV2022-053499

Well she would be the person with the most direct knowledge. Is she still employed by the county?

On Tue, Jan 17, 2023, 2:01 PM Jack O'Connor (MCAO) <[oconnorj@mcao.maricopa.gov](mailto:oconnorj@mcao.maricopa.gov)> wrote:

Bryan,

Celia is no longer employed with the Recorder's Office. If scope of the deposition is about the County's response to the PRR then Rey Valenzuela could be able to answer those questions. Let me know how you want to proceed.

Thank you,

Jack O'Connor

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**From:** Bryan Blehm <[bryan@blehmlegal.com](mailto:bryan@blehmlegal.com)>  
**Sent:** Thursday, January 12, 2023 1:00 PM  
**To:** Jack O'Connor (MCAO) <[oconnorj@mcao.maricopa.gov](mailto:oconnorj@mcao.maricopa.gov)>; Joseph LaRue (MCAO) <[laruej@mcao.maricopa.gov](mailto:laruej@mcao.maricopa.gov)>  
**Subject:** CV2022-053499

Jack,

I discussed the possibility of deposing Celia of the elections department with Joe LaRue during the Lake v. Hobbs ballot inspection. He said he would get back with me but has not. The scope of the deposition would be limited to the county's response to the PRR at issue in this matter and can be conducted at MCTEC. Please let me know if you are agreeable to this and whether you have any dates in the next two weeks.

Bryan James Blehm

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