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12 *Attorneys for Plaintiffs IceArizona Manager Co LLC and*
13 *IceArizona Hockey Co LLC*

8 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
9 IN AND FOR THE COUNTY OF MARICOPA

11 ICEARIZONA MANAGER CO LLC, a
12 Delaware Limited Liability Company;
13 ICEARIZONA HOCKEY CO LLC, a
14 Delaware Limited Liability Company,

15 Plaintiffs,

16 v.

17 CITY OF GLENDALE, an Arizona
18 Municipal Corporation; CITY OF
19 GLENDALE CITY COUNCIL; JERRY
20 WEIERS, in his official capacity as City
21 of Glendale Mayor; IAN HUGH, in his
22 official capacity as City of Glendale
23 Vice Mayor and Councilmember;
24 BART TURNER, in his official capacity
25 as City of Glendale Councilmember;
26 LAUREN TOLMACHOFF, in her
27 official capacity as City of Glendale
28 Councilmember; JAMIE ALDAMA, in
his official capacity as City of Glendale
Councilmember; GARY SHERWOOD,
in his official capacity as City of
Glendale Councilmember; SAMUEL
CHAVIRA, in his official capacity as
City of Glendale Councilmember; DICK
BOWERS, in his official capacity as
City of Glendale Acting City Manager;
MICHAEL BAILEY, in his official
capacity as City of Glendale City
Attorney,

Defendants.

No.

**MOTION FOR ENTRY OF ORDER
EXPEDITING DISCOVERY**

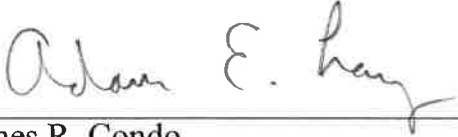
1 Plaintiffs respectfully move for entry of an order allowing for expedited discovery
2 in advance of an evidentiary hearing on Plaintiffs' application for a temporary restraining
3 order. As demonstrated in Plaintiffs' Verified Complaint, Application for Temporary
4 Restraining Order and Request for Evidentiary Hearing on Preliminary Injunction, the
5 Memorandum of Points and Authorities, the declarations, and other filings in support
6 thereof, which were filed contemporaneously herewith, good cause exists for an order
7 requiring expedited discovery. *See* Ariz. R. Civ. P. 26(d) (allowing the Court to, upon
8 motion by the parties, to issue orders concerning the methods and management of
9 discovery); *Braillard v. Maricopa County*, 224 Ariz. 481, 497, 232 P.3d 1263, 1279 (Ct.
10 App. 2010) (“[I]n matters of discovery a trial court has broad discretion which will not
11 be disturbed absent a showing of abuse.”) (citation omitted). Plaintiffs request discovery
12 to properly prepare for any show cause hearing or evidentiary hearing on the preliminary
13 injunction, and Plaintiffs' discovery will be narrowly tailored to the immediate issues
14 facing the parties and this Court. Accordingly, Plaintiffs request that the Court enter the
15 proposed order granting expedited discovery.

16 A proposed Order is attached hereto as Exhibit A.

17 DATED this 12th day of June, 2015.

18 SNELL & WILMER L.L.P.

19
20
21 By


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Exhibit A
(Proposed Order)

1 James R. Condo (#005867)
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BOWERS, in his official capacity as
25 City of Glendale Acting City Manager;
MICHAEL BAILEY, in his official
26 capacity as City of Glendale City
Attorney,

27 Defendants.
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No.

**ORDER GRANTING MOTION FOR
ENTRY OF ORDER EXPEDITING
DISCOVERY**

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Plaintiffs, having filed a Motion for Entry of Order Expediting Discovery, and good cause appearing,

IT IS HEREBY ORDERED that the parties may engage in expedited discovery as necessary to prepare for any hearing on Plaintiffs' application for a temporary restraining order. The parties are directed to respond to reasonable discovery requests, and work together to develop and agree to a reasonable expedited discovery plan and submit a stipulation regarding the same to the court.

DATED this ____ day of June, 2015.

Maricopa County Superior Court Judge

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