

John S. Gleason
Independent Bar Counsel
Colorado Supreme Court
Office of Attorney Regulation Counsel
1560 Broadway, Suite 1800
Denver, Colorado 80202
(303) 866-6400

**BEFORE THE PRESIDING DISCIPLINARY JUDGE
OF THE STATE BAR OF ARIZONA**

**In the Matter of Members of the
State Bar of Arizona,**

**ANDREW P. THOMAS, Bar No. 014069,
LISA M. AUBUCHON, Bar No. 013141, and
RACHEL R. ALEXANDER, Bar No. 020092**

**INDEPENDENT BAR COUNSEL'S
FIRST SET OF NON-UNIFORM
INTERROGATORIES TO RACHEL R.
ALEXANDER**

Case No. PDJ 2011-9002

To: RACHEL R. ALEXANDER

Pursuant to Supreme Court Rule 48(b), and Rules 33, 33.1 and 34 of the Arizona Rules of Civil Procedure, Independent Bar Counsel, John S. Gleason, hereby propounds the following Non-Uniform Interrogatories and Request for Production.

DEFINITIONS

1. The term "blog" means any Internet website containing comments and personal opinions.
2. The term "blog entry" means any content that is posted on a blog.
3. The term "identify," when used in connection with a website, means to name the website's address, URL, or common name.
4. The term "identify," when used in connection with a blog entry, means to name by title, date and website address.

1 **Answer:**

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Interrogatory 5:

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Please identify any and all websites where your blog entries were posted, whether under your own name, on behalf of another person, under an alias, or anonymously, during the relevant time period.

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Answer:

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Interrogatory 6:

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Please identify any and all online content that you wrote, edited, approved, or posted, whether under your own name, on behalf of another person or website, under an alias, or anonymously, which concerned any one or all of the following persons or entities during the relevant time period:

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Answer:

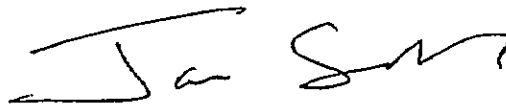
- Any members of the Maricopa County Board of Supervisors,
- David Smith (County Manager),
- Sandi Wilson (Deputy County Manager),
- Wade Swanson (Office of General Litigation),
- judges of the Superior Court of Arizona,
- Thomas Irvine,
- Edward Novak, or
- Polsinelli Shughart P.C.,

1 **REQUEST FOR PRODUCTION**

2 **Request for Production 1**

3 Please produce a copy of each item that you identified in answering
4 Interrogatory No. 6 above.

5 **RESPECTFULLY SUBMITTED** this 27th day of June, 2011.

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9 JOHN S. GLEASON, Independent Bar Counsel
10 Chief Justice Order No. 2010-14
11 JAMES S. SUDLER
12 COLORADO SUPREME COURT
13 OFFICE OF ATTORNEY REGULATION COUNSEL
14 1560 Broadway, Suite 1800
15 Denver, CO 80202
16 303-866-6400

17 **COPY** of the foregoing Independent Bar Counsel's First Set of Non-Uniform
18 Interrogatories to Rachel R. Alexander sent by Email and United States Mail this
19 27th day of June, 2011 to:

20 Donald Wilson, Jr.
21 Terrence P. Woods
22 Brian Holohan
23 Broening Oberg Woods & Wilson
24 Post Office Box 20527
25 Phoenix, AZ 85036

26 Edward P. Moriarity
Bradley L. Booke
Shandor S. Badaruddin
Moriarity, Badaruddin, & Booke, LLC
124 West Pine Street, Suite B
Missoula, MT 59802-4222

Scott H. Zwillinger
Zwillinger Greek Zwillinger & Knecht PC

1 2425 E. Camelback Road, Suite 600
2 Phoenix, AZ 85016-4214

3 By Nadine M. Cignoni
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