| 1<br>2<br>3<br>4<br>5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | AMERICAN CIVIL LIBERTIES UNION FOUNDATION OF ARIZONA Jared G. Keenan, State Bar No. 027068 Christine K. Wee, State Bar No. 028535 2712 N. 7th Street Phoenix, Arizona 85006 Telephone: (602) 650-1854 E-Mail: jkeenan@aclu.org cwee@aclu.org                                                                                                                          | AMERICAN CIVIL LIBERTIES UNION FOUNDATION Leah Watson, admitted pro hac vice Scout Katovich, admitted pro hac vice 125 Broad Street, 18th Floor New York, NY 10004 Telephone: (212) 549-2500 E-Mail: lwatson@aclu.org skatovich@aclu.org                                                                                           |
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| 6 7 8 9 110 111 112 113 114                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | ZWILLINGER WULKAN PLC Benjamin L. Rundall, State Bar No. 031661 Alexis Eisa, State Bar No. 038702 2020 North Central Avenue, Suite 675 Phoenix, Arizona 85004 Telephone: (602) 962-2969 E-Mail: ben.rundall@zwfirm.com  Attorneys for Plaintiffs                                                                                                                      | Andrew Kim, admitted pro hac vice Courtney L. Hayden, admitted pro hac vice Collin M. Grier, admitted pro hac vice Madeline Fuller, admitted pro hac vice 1900 N Street, N.W. Washington, D.C. 20036 Telephone: 202-346-4000 E-Mail:  AndrewKim@goodwinlaw.com CHayden@goodwinlaw.com CGrier@goodwinlaw.com MFuller@goodwinlaw.com |
| 15                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | UNITED STATES DISTRICT COURT                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                    |
| 16                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | DISTRICT OF ARIZONA                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                    |
| 117   118   119   120   121   122   122   123   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124   124 | Fund for Empowerment, a nonprofit corporation, in its individual capacity; Ronnie Massingille, individually; Mohamed Sissoho, individually; Dyrwood Moore, individually; Faith Kearns, individually; Frank Urban, individually; Timothy James, individually; Sherdina Carr, individually; Papy Abdul Idrissa, individually; and Jason Rich, individually, Plaintiffs, | No. CV-22-02041-PHX-GMS  NOTICE OF FILING SECOND AMENDED COMPLAINT FOR DECLARATORY AND INJUNCTIVE                                                                                                                                                                                                                                  |
| 25                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                    |
| 26<br>27<br>28                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Vs.  City of Phoenix, a political subdivision of the state of Arizona; Rachel Milne, individually, and in her official capacity as the Director of the Office of Homeless                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                    |

1 Solutions; and Michael Sullivan individually, and in his official capacity as 2 Interim Chief of the Phoenix Police Department, Entities I-X, political 3 subdivisions of the state of Arizona; and 4 John and Jane Does 1-75, in their individual capacities, 5 6 7 Defendants. 8 9 Plaintiffs give notice of the filing of their Second Amended Complaint for 10 Declaratory and Injunctive Relief, as permitted by this Court's Order dated April 9, 2024 (Doc. 137). Plaintiffs attach a redline version of the Second Amended Complaint which 11 12 details the differences of it from Plaintiffs' First Amended Complaint (Exhibit 1). Plaintiffs 13 separately filed their Second Amended Complaint. 14 Dated this 29th day of April, 2024. 15 AMERICAN CIVIL LIBERTIES UNION FOUNDATION OF ARIZONA 16 By: /s/ Jared G. Keenan Jared G. Keenan 17 Christine K. Wee 18 ZWILLINGER WULKAN By: /s/ Benjamin L. Rundall 19 Benjamin L. Rundall 20 AMERICAN CIVIL LIBERTIES UNION **FOUNDATION** 21 By: /s/ Leah Watson Leah Watson, pro hac vice 22 Scout Katovich, pro hac vice 23 GOODWIN PROCTER LLP By: /s/ Andrew Kim 24 Andrew Kim, pro hac vice Collin M. Grier, pro hac vice 25 Madeline Fuller, pro hac vice 26 Courtney L. Hayden, pro hac vice 27 Attorneys for Plaintiffs 28

## **CERTIFICATE OF SERVICE**

I hereby certify that on April 29, 2024, I electronically filed the foregoing with the Clerk of the Court for the U.S. District Court for the District of Arizona by using the CM/ECF System. All participants in the case who are registered CM/ECF user will be served by the CM/ECF system.

<u>/s/Jared G. Keenan</u> Jared G. Keenan