

SCOTT YOUNG (10695)
SNOW CHRISTENSEN & MARTINEAU
10 Exchange Place, 11th Floor
Salt Lake City, Utah 84111
Telephone: (801) 521-9000
rsy@scmlaw.com
Attorneys for Defendants

SHAWN GUZMAN (07392)
JAMI R. BRACKIN (08753)
RYAN N. DOOLEY (17009)
CITY OF ST. GEORGE
175 E. 200 N.
St. George, Utah 84765
shawn.guzman@sgcity.org
jami.brackin@sgcity.org
ryan.dooley@scgity.org
Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

SOUTHERN UTAH DRAG STARS, LLC,
and MITSKI AVALOX,

Plaintiffs,

vs.

CITY OF ST. GEORGE, CITY COUNCIL OF
ST. GEORGE, COUNCILMEMBER JIMMIE
HUGHES, COUNCILMEMBER DANIELLE
LARKIN, COUNCILMEMBER NATALIE
LARSEN, COUNCILMEMBER GREGG
MCARTHUR, COUNCILMEMBER
MICHELLE TANNER, MAYOR MICHELE
RANDALL, and CITY MANAGER JOHN
WILLIS,

Defendants.

DEFENDANTS' DEPOSITION PLAN

Civil No. 4:23CV44

Honorable David Nuffer

Pursuant to the Court's Order dated December 13, 2023 ([Dkt. 82](#)), Defendants St. George City, City Council of St. George, Councilmembers Jimmie Hughes, Danielle Larkin, Natalie Larsen, Gregg McArthur, and Michelle Tanner, Mayor Michelle Randall, and City Manager John Willis (collectively "Defendants") hereby submit their Deposition Plan.

Defendants filed a Motion to Stay Discovery based on their Motion for Partial Summary Judgment for Mootness on January 9, 2024. *See* [Dkt. #86](#). Defendants believe all depositions should be stayed pending resolution of this motion, as it may significantly reduce the scope of discovery.

With regard to depositions, Defendants currently intend to depose the following:

- Plaintiff Mitski Avalox.
- Plaintiff Southern Utah Drag Stars, LLC (30(b)(6))
- Tara Lypsinki (professional drag artist and performer)
- Lisa Dorn (Certified Complex Trauma Professional)

In addition to the above, the parties have designated the following witnesses in their Initial

Disclosures:

Plaintiffs' Initial Disclosures

- Plaintiff Mitski Avalox (Plaintiff)
- Tara Lipsyncki (professional drag artist and performer)
- Lisa Dorn (Certified Complex Trauma Professional)
- Defendant Michelle Tanner (St. George City Council Member)
- Defendant Jimmie Hughes (St. George City Council Member)
- Defendant Danielle Larkin (St. George City Council Member)
- Defendant Natalie Larsen (St. George City Council Member)
- Defendant Gregg McArthur (former St. George City Council Member)
- Defendant Michele Randall (St. George City Mayor)
- Defendant John Willis (St. George City Manager)
- Sara Reber (St. George City employee)
- Marc Mortensen (St. George City employee)
- Tani Downing (former St. George City Attorney)
- Ryan Dooley (Assistant St. George City Attorney)
- Jami Brackin (Assistant St. George City Attorney)
- Jocelyn Chavez (former St. George City employee)

Defendants' Initial Disclosures

The witnesses Defendants disclosed are included in the witnesses disclosed by Plaintiffs.

For the reasons set forth in their Motion to Stay Discovery, Defendants request that no depositions be taken or scheduled pending the Court's ruling on their Partial Motion for Summary Judgment.

DATED this 12th day of January, 2024.

SNOW CHRISTENSEN & MARTINEAU

/s/ Scott Young
Scott Young
Attorneys for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 12th day of January, 2024, I electronically filed the foregoing **DEFENDANTS' DEPOSITION PLAN** with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to all counsel of record.

/s/ Annette Gamero