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STATE OF NEW MEXICO
COUNTY OF SANTA FE
FIRST JUDICIAL DISTRICT COURT

CAUSE NO. D-101-CV-2011-02942

BRAIN F. EGOLF, JR., HAKIM BELLAMY, MEL HOLGUIN, MAURILIO CASTRO and
ROXANE SPRUCE BLY,

Plaintiffs,

-VS-

DIANNA J. DURAN, in her official capacity as New Mexico Secretary of State, SUSANA MARTINEZ, in her official capacity as New Mexico Governor, JOHN A. SANCHEZ, in his official capacity as New Mexico Lieutenant Governor and presiding officer of the New Mexico Senate, TIMOTHY Z. JENNINGS, in his official capacity as President Pro-Tempore of the New Mexico Senate, and BEN LUJAN SR., in his official capacity as Speaker of the New Mexico House of Representatives,

Defendants.

**CONSOLIDATED WITH CAUSE NOS.: D-101-CV-2011-02944; D-101-CV-2011-03016;
D-101-CV-2011-03099; D-101-CV-2011-03107; D-101-CV-2011-02945; D-506-CV-2011-00913;
D-202-CV-2011-09600**

**JAMES PLAINTIFFS' MOTION FOR
APPOINTMENT OF SPECIAL MASTER**

Conrad James, Devon Day, Marge Teague, Monica Youngblood, Judy McKinney and John Ryan, Plaintiffs in Cause No. D-202-CV-2011-9600 ("the James Plaintiffs"), respectfully move the Court to appoint a special master to prepare proposed plans for redrawing the boundaries of New Mexico's Congressional, House of Representatives, Senate and Public Regulation Commission.

1. The task facing the parties and the Court in this litigation is huge. As was summarized by counsel at the October 17, 2011 scheduling hearing, each of the seven sets of litigants likely will be proposing two, three or four districting plans (Congress, the Senate, the House and the Public Regulation Commission). This effort will involve engaging demographers and/or other experts to develop and defend the plans, and calling lay witnesses to demonstrate

how the plans promote state policies such as accommodating for communities of interest. Each set of litigants will, of course, also engage experts and call lay witnesses to attack the other parties' plans. The result will be a complex and hotly contested "beauty contest" in which the Court will be asked to either pick a winner or craft its own plan. The most recent redistricting litigation in 2001 and 2002 consumed approximately twelve trial days during which counsel recall twenty or more witnesses testified. Given that it involves four districting plans, trying the case at bar likely will be twice as long and complicated, yet the Court would be constrained to issue rulings in roughly the same amount of time.

2. The expense will be enormous. The legal and expert witness fees and other costs for the redistricting litigation ten years ago apparently exceeded \$4 million. See Exhibit 1 attached hereto. Given inflation, and with twice as many plans being litigated by more parties, the expense this time likely will be at least doubled to \$8 million or more. Further, because the existing districting plans indisputably do not comply with constitutional one man, one vote requirements, each of the plaintiff groups will be able to claim that they are prevailing parties and entitled to recover their attorneys fees from the State under 42 U.S.C. § 1988. The State, of course, already is paying for the defendant officials' legal expenses. The taxpayers will be outraged by this added¹ drain on the public fisc, especially at a time when schools and other agencies are being forced to cut their budgets.

3. Courts around the country have concluded that these combined problems of complexity, limited time and significant expense constitute exceptional circumstances, see, e.g., NMRA 2011, Rule 1-053(B), that justify appointment of special masters to draw the boundaries for legislative and other political district boundaries where previous legislative efforts have either failed or been ruled unconstitutional. See, e.g., Grandy v. Wetherell, 794 F. Supp. 1076, 1081

¹ The cost of this litigation will be in addition to the cost of the failed special session.

(N.D. Fla. 1992); Puerto Rican Legal Defense Fund, Inc. v. Gantt, 796 F. Supp. 681, 684 (E.D.N.Y. 1992); United States v. Berks County, 250 F. Supp. 2d 525, 542 (E.D. Pa. 2003); Larios v. Cox, 306 F. Supp. 2d 1212, 1213 (N.D. Ga. 2004); Guy v. King, No. 11-OC-0042-1B (Nev. 1st Jud. Dist. Ct. Aug. 4, 2011) (appointing panel of three special masters) (attached hereto as Exhibit 2).

4. Redistricting special masters can be recruited from the ranks of academics, demographers or retired judges. If they do not already have experience with drawing the boundaries of political districts and operating the computer software that today expedites the process, they can hire assistants who do. Special masters can act very quickly to develop districting plans. See, e.g., Puerto Rican Legal Defense and Education Fund, Inc. v. Gantt, 796 F. Supp. at 684 (special master appointed on May 6, 1992 and issued report on May 26, 1992); Grandy v. Wetherell, 794 F. Supp. at 1081 (special master appointed on April 6, 1992 and issued report on May 14, 1992); United States v. Berks County, 250 F. Supp. 2d at 542 n.9 (court noted that plan needed to be completed in time for primary election that was scheduled sixty days later). Larios v. Cox is particularly instructive, because the process was completed in less than a month. There, a three-judge panel ruled on February 10, 2004 that reapportionment plans for the Georgia House of Representatives and Senate that had been passed by the legislature and approved by the governor were unconstitutional.² 300 F. Supp. 2d 1320. On March 1, 2004, the court appointed a special master, 306 F. Supp. 2d 1212, and the following day issued instructions, 306 F. Supp. 2d 1214. On March 15, 2004, the special master issued his initial reapportionment plan; on March 19, 2004, the parties filed comments and objections; on March

² The New Mexico Legislature failed last month to pass a Congressional district plan, and the Governor vetoed the plans that were passed for the House, the Senate and the Public Regulation Commission districts. Thus, in contrast to the procedural posture in Larios v. Cox, the Court is starting here with redistricting plans based on the 2000 census that the James Plaintiffs believe none of the parties will contend is constitutional. This litigation effectively is limited to determining a remedy for an admittedly unconstitutional condition.

22, 2004, the special master issued a supplemental report that addressed the comments; and on March 22 and 25, 2004, the court held a hearing to consider remaining comments and objections, and at the conclusion of the hearing adopted the special master's plan. 314 F. Supp. 2d at 1361-64.

5. Appointment of a special master will drastically reduce the time and expense involved in resolving this dispute and producing Congressional, House, Senate and PRC redistricting plans precisely because it will avoid a "beauty pageant" trial. There will be no competing maps that the parties advocate or attack, and the Court will not be faced with the task of either choosing among those (likely more or less partisan) maps or undertaking the equally if not more difficult burden of fashioning its own map. Instead, the focus of the parties' and the Court's attention will be one presumptively neutral map that the Special Master draws for each of the Congressional, House, Senate and PRC districts. Further, the Court can streamline the process by which the parties can criticize and propose adjustments to the special master's maps.

6. The James Plaintiffs would urge the Court here to implement a schedule patterned after that employed by the court in Larios v. Cox. The specific dates could be determined at an expedited hearing early next week, but the following schedule demonstrates the feasibility of a special master appointment:

a. The parties would submit the names of proposed special masters and their resumes to the Court by Thursday, October 27, 2011; at the same time, they would submit proposed instructions and supporting authority.³ Parties could comment on other parties' proposed special masters by Friday, October 28.

³ There are two readily available starting points for the Court to craft instructions. First, the Larios v. Cox court's instructions are set out at 306 F. Supp. 2d 1214. Also, although they would be subject to modification for use by the court versus the legislature, the New Mexico Legislative Council Service created redistricting guidelines for the 2011 special session. See Exhibit 3 attached hereto.

b. The Court would appoint a special master by Friday, November 4. Counsel for Defendants Lujan and Jennings could be directed to provide the special master immediately with the maps and statistical information regarding the existing Congressional, House, Senate and PRC plans that the Legislative Council Service prepared in advance of the recent special session, as well as the maps and statistical information that that agency prepared in connection with the plans that were proposed during the session.

c. The special master would be directed to prepare Congressional, House, Senate and PRC plans by Wednesday, November 30.⁴

d. The parties could submit proposed plans and written analysis to the special master by Monday, November 14, and responsive analysis by Monday, November 21.

e. The Court would hold a hearing during the week of December 5-9, at which the parties would be given an opportunity to present evidence and/or argument about the special master's plan.

f. On December 15, the parties would submit written final argument and proposed findings of fact and conclusions of law.

g. The Court would issue its findings and conclusions, including adoption of plans and maps for Congressional, House, Senate and PRC districts, by January 6, 2012.

This schedule is set forth in the proposed order attached hereto as Exhibit 4, as directed by the Court on at the October 17, 2011 hearing.

For all of these reasons, the James Plaintiffs respectfully request the Court to appoint a special master to prepare proposed plans for redrawing the boundaries of New Mexico's Congressional, House of Representatives, Senate and Public Regulation Commission districts.

⁴ If the Court wishes, it could permit the parties to conduct discovery concurrent with the Special Master's preparation of his or her report.

Respectfully submitted,

RODEY, DICKASON, SLOAN, AKIN & ROBB, P.A.

By: /s/ Henry M. Bohnhoff

Henry M. Bohnhoff
P.O. Box 1888
Albuquerque, NM 87103
Phone: (505) 765-5900
hbohnhoff@rodey.com

SAUCEDO CHAVEZ, PC

Christopher T. Saucedo
Iris L. Marshall
100 Gold Ave. SW, Suite 206
Albuquerque, NM 87102
Phone: (505) 275-3200
csaucedo@saucedochavez.com

DAVID A. GARCIA LLC

David A. Garcia
1905 Wyoming Blvd. NE
Albuquerque, NM 87112
Phone: (505) 275-3200
david@theblf.com
*Attorneys for Plaintiffs James, Day, Teague, Youngblood, McKinney
and Ryan*

CERTIFICATE OF SERVICE:

WE HEREBY CERTIFY that on the 19th day of October, 2011, we filed the foregoing electronically, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing and we e-mailed a true and correct copy of the foregoing pleading on this 19th day of October, 2011 to the following:

The Honorable James Hall
James A. Hall LLC
505 Don Gaspar Ave
Santa Fe, NM 87505-4463
(505) 988-9988
jhall@jhall-law.com

Robert M. Doughty, III
Judd C. West
Doughty & West, P.A.
20 First Plaza NW, Suite 412
Albuquerque, NM 87102
(505) 242-7070
rob@doughtywest.com
volanda@doughtywest.com

Attorney for Defendants Dianna J Duran, in her official capacity as New Mexico Secretary of State and John A. Sanchez, in his official capacity as New Mexico Lieutenant Governor and presiding officer of the New Mexico Senate

Paul J. Kennedy
201 12th Street NW
Albuquerque NM 87102-1815
(505) 842-0653
pkennedy@kennedyhan.com

Jessica Hernandez
Matthew J. Stackpole
Office of the Governor
490 Old Santa Fe Trail #400
Santa Fe, NM 87401-2704
(505) 476-2200
jessica.hernandez@state.nm.us
matthew.stackpole@state.nm.us

Attorneys for Defendant Susana Martinez, in her official capacity as New Mexico Governor

Ray M. Vargas, II
David P. Garcia
Erin B. O'Connell
Garcia & Vargas, LLC
303 Paseo del Peralta
Santa Fe, NM 87501
(505) 982-1873
ray@garcia-vargas.com
david@garcia-vargas.com
erin@garcia-vargas.com

Joseph Goldberg
John W. Boyd
David H. Urias
Sara K. Berger Freedman
Boyd Hollander
Goldberg & Ives
20 First Plaza Ctr. NW. #700
Albuquerque, NM 87102
(505) 842-9960
jg@fbdlaw.com
jwb@fbdlaw.com
dhu@fbdlaw.com
skb@fbdlaw.com

Attorneys for Plaintiffs in Egolf v. Duran, D-101-CV-2011-02942; Holguin v. Duran, D-101-CV-2011-0944; and Castro v. Duran, D-101-CV-2011-02945

Patrick J. Rogers
Modrall, Sperling, Roehl, Harris & Sisk P A
P.O. Box 2168
Albuquerque, NM 87103
(505) 848-1849
pir@modrall.com
Attorneys for Plaintiffs in Sena v. Duran, D-506-CV-2011-00913

Casey Douma
Attorney at Law
PO Box 812
Laguna NM 87026-0812
(505) 552-5776
cdouma@lagunatribe.org

Teresa Leger
Nordhaus Law Firm LLP
1239 Paseo de Peralta
Santa Fe NM 87501-2758
(505) 982-3622
tleger@nordhauslaw.com

Cynthia Kiersnowski
Nordhaus Law Firm LLP
1239 Paseo de Peralta
Santa Fe NM 87501-2758
(505) 982-3622
ckiersnowski@nordahuslaw.com
Attorneys for Plaintiffs in Pueblo of Laguna v. Duran, D-101-CV-2011-03016

David K. Thomason
Thomason Law Firm
303 Paseo de Peralta
Santa Fe NM 87501-1860
(505) 982-1873
david@thomasonlawfirm.net
Attorney for Plaintiffs in Maestas v. Duran, D-101-CV-2011-03099 and Maestas v. Duran, D-101-CV-2011-03107

Stephen G. Durkovich
Law Office of Stephen Durkovich
534 Old Santa Fe Trail
Santa Fe, NM 87505-0372
(505) 986-1800
romero@durkovich.com

John V. Wertheim
Jones, Snead, Wertheim & Wentworth, P.A.
PO Box 2228
Santa Fe, NM 87505-2228
(505) 982-0011
johnv@thejonesfirm.com
Attorneys for Plaintiffs in Maestas v. Duran, D-101-CV-2011-03107

Luis G. Stelzner
Sara N. Sanchez
Stelzner, Winter, Warburton, Flores, Sanchez & Dawes, P.A.
PO Box 528
Albuquerque NM 87103
(505) 988-7770
lgs@stelznerlaw.com
ssanchez@stelznerlaw.com

Richard E. Olson
Jennifer M. Heim
Hinkle, Hensley, Shanor & Martin, PLP
PO Box 10
Roswell NM 88202-0010
(575) 622-6510
rolson@hinklelawfirm.com
jheim@hinklelawfirm.com

Attorneys for Defendants Timothy J. Jennings, in his official capacity as President Pro-Tempore of the New Mexico Senate and Ben Lujan, Jr., in his official capacity as Speaker of the New Mexico House of Representatives

/s/ Henry M. Bohnhoff

NEW MEXICO LEGISLATIVE COUNCIL SERVICE
411 State Capitol
Santa Fe, New Mexico 87501
(505) 986-4600
October 15, 2003

Information Memorandum No. 202.147870A

TO: File

FROM: Jon Boller

SUBJECT: REDISTRICTING AND REDISTRICTING LITIGATION COSTS

The legislative council service (LCS) contracted with two law firms — Hinkle, Hensley, Shanor & Martin, LLP, and Sheehan, Sheehan & Stelzner, PA — to provide the legislature with legal counsel during the redistricting process and any ensuing litigation. Billing through September 2001, which marked the end of the special legislative session on redistricting, totaled \$122,761.70. Litigation costs for October 2001 through June 2002 totaled an additional \$653,693.69. Included in the litigation costs are expert witness fees of \$11,639.38 for Brian McDonald and \$45,528.54 for Lisa R. Handley.

Research & Polling, Inc., provided the redistricting committee and the legislature with technical assistance during the redistricting process, 2001 special session and 2002 regular session, as well as support during litigation. The total amount paid to Research & Polling was \$697,354.91. During the 2003 session, LCS again contracted with Research & Polling for services related to redrawing precinct lines in Taos county, magistrate court districts in San Juan county, state senate districts and congressional districts. Total cost for the 2003 session was \$12,697.50.

Per diem and mileage costs for voting and advisory members of the redistricting committee during the 2001 interim totaled \$108,089.

The legislature appropriated \$690,740 from LCS cash balances for expenses of the first special session of the forty-fifth legislature, which convened on September 4, 2001 and adjourned on September 20, 2001.

In addition to the above-mentioned amounts for redistricting paid by the LCS, the risk management division of the general services department paid attorney fees and costs of \$2,972,660.14 to the various plaintiffs, intervenors and defendants involved in the redistricting cases in accordance with a settlement agreement entered into by the various parties.

Total costs of the redistricting process outlined above are approximately \$5.2 million.

1 Case No. 11 OC 00042 1B

2 Dept. No. I

REC'D & FILED

2011 AUG -4 AM 10:36

ALAN GLOVER
CLERK

BY Chris
DEPUTY

3
4
5
6 IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
7 IN AND FOR CARSON CITY
8

9 DORA J. GUY, an individual; LEONEL
10 MURRIETA-SERNA, an individual; EDITH
11 LOU BYRD, an individual; and SAMANTHA
12 STEELMAN, an individual;

13 Plaintiffs,

14 and

15 KEN KING, an individual; SANCY KING, an
16 individual; ALLEN ROSOFF, an individual,
17 and the NEVADA REPUBLICAN PARTY,

18 Plaintiff-Intervenors

19 vs.

20 ROSS MILLER, in his capacity as Secretary of
21 State for the State of Nevada,

22 Defendant.
23
24

**AMENDED
ORDER APPOINTING SPECIAL
MASTERS, ESTABLISHING
SEQUENCE OF EVENTS
AND DEADLINES**

25 The Court on July 12, 2011 issued an Order Directing Parties to Provide
26 Information to the Court and setting intervenor deadline. On July 20, 2011, the Plaintiffs
27 duly filed their Recommendations on Special Masters and briefs on various issues. The
28 Defendant, Secretary of State additionally, on July 20, 2011, filed its Recommendation for
Special Masters.

First, the Court duly appreciates the parties input into the selection of Special
Masters and the names provided contain many qualified and appropriate suggestions. As
the Court indicated at its initial hearing, it was and is the intent of the Court to attempt to
remove politics from this process to the extent possible. The Court is not naive and

1 understands that no matter who is appointed as Special Master, there will be criticism and
2 comments, whether justified or not.

3 **1. Special Masters recommendations.**

4 IT IS ORDERED that the Court shall refer the matter to a panel of Special Masters.
5 The Court hereby appoints the following individuals to act as the Special Masters and they
6 have agreed to act in this capacity: Alan Glover, Carson City Clerk Recorder, Thomas
7 Sheets, Esq., Las Vegas, Nevada, and Robert Erickson, formerly with the Legislature
8 Counsel Bureau. Any party may object to the appointment of a person as a Special Master
9 pursuant to the grounds set forth in NRCP 53(a)(2).

10 IT IS FURTHER ORDERED that to expedite this matter, the Court will receive
11 briefing and hold a hearing on the legal issues, as described below, so that the Court may
12 instruct the appointed Special Masters.

13 IT IS FURTHER ORDERED that the Special Masters, if allowed by their current
14 jobs, will be compensated for their time, pursuant to NRCP 53; and, as determined by the
15 Court.

16 **2. Legal issues and briefing schedule.**

17 IT IS ORDERED that the following legal issues will be determined by the Court
18 prior to referral to the Special Masters:

19 (1) population requirements for U.S. Congressional and Nevada state legislative
20 redistricting maps;

21 (2) traditional redistricting criteria to be used — (e.g.a) Contiguous Districts, (b)
22 Preserving County/Political Boundaries, (c) Preserving Communities of Interest), (d)
23 Compactness;

24 (3) appropriate starting point consideration of prior maps proposed in the
25 legislative process, or base map, for the redistricting process if any;

26 (4) factors, if any, to consider for representational fairness (e.g. election results the
27 panel of Special Masters may use, requisite level of representational fairness, if any, that
28 the new districts must meet, and considerations of incumbency);

1 (5) application of Section 2 of the Voting Rights Act of 1965, to include whether
2 the Act requires the creation of a majority-minority congressional district and any other
3 majority-minority legislative districts in Nevada.

4 IT IS FURTHER ORDERED that each party shall submit briefing on resolution of
5 these five legal issues and proposed directives to the Special Masters. In accordance with
6 the local rules each party shall submit a proposed order with its briefing with the specific
7 proposed court directives to the Special Masters if the party's position is accepted. *These*
8 *briefs are due within twenty (20) judicial days of the entry of the original order, dated*
9 *August 3, 2011, but no later than August 31, 2011. Thereafter, the parties shall have*
10 *five (5) days following service of the briefs to respond to the other parties' briefs, but no*
11 *later than September 7, 2011. Any replies shall thereafter be due five (5) days following*
12 *service of the responding briefs, but no later than September 14, 2011. This is to allow*
13 *the Court time to review all briefs prior to the hearing date.*

14 IT IS FURTHER ORDERED that the hearing on the five legal issues shall be held
15 on September 19, 2011 at 1:30 p.m.

16 IT IS FURTHER ORDERED that each party will be allowed to present expert
17 testimony to the Court in regard to the legal issues. This testimony may be permitted by
18 way of expert report, affidavit, videotaped deposition or testifying before the Court. The
19 parties shall be limited to a maximum of two experts. Any reports, affidavits, or videos to
20 be filed with the Court will need to be filed ten (10) days prior to the hearing date and
21 provided to opposing parties at that time, who may file any response thereto five (5) days
22 prior to the hearing.

23 **3. Special master proceedings and directives.**

24 IT IS ORDERED that the process and hearings with the Special Masters shall be
25 governed by NRCP 53 and Rule 5 FJDCR.

26 IT IS FURTHER ORDERED that once the legal issues outlined above have been
27 resolved by the Court, the matter of drawing maps and related issues shall be referenced to
28 the panel of Special Masters with an order to set the NRCP 53(d)(1) meeting.

1 IT IS FURTHER ORDERED that the reference to Special Masters shall contain the
2 Court's directives on legal issues as noted previously, a directive to hold at least one
3 hearing with the parties' own experts as authorized by NRCP 53, and a directive to prepare
4 a Special Masters' report by a date certain for presentation to the Court. The specific
5 schedule will be determined by the Court in consultation with the Special Masters.

6 IT IS FURTHER ORDERED that the Special Masters may, in accordance with
7 NRCP 53 and at their discretion, hold up to two additional hearings with the parties and
8 their expert witnesses, as needed, in the panel's discretion to facilitate the Special Masters'
9 understanding of the parties' positions and the completion of their report.

10 All hearings with the parties held by the Special Masters shall be open to the
11 public. Prior to a party presenting any testimony or information to the Special Masters, the
12 parties shall comply with NRCP 26 governing expert witness testimony, reports,
13 deposition, and discovery. More specifically, the parties shall produce and serve an expert
14 report five (5) judicial days prior to the party's initial hearing with experts before the
15 Special Masters. Parties may depose an expert who produces a report or otherwise
16 provides testimony or information to the Special Masters at a reasonably and mutually
17 convenient time for the parties and the expert, however, the depositions of all the experts
18 who the parties wish to depose shall conclude no later than five (5) judicial days before the
19 time set forth below for the parties to submit their motions to revise the Special Masters'
20 report.

21 IT IS FURTHER ORDERED that the Court requests that the Nevada Legislature
22 Counsel Bureau provide technical assistance to the Special Masters by making Brian Davie
23 and Kathy Steinle available to provide demographic information and computer program
24 assistance .

25 IT IS FURTHER ORDERED that once the Special Masters have presented their
26 report to the Court (including proposed redistricting maps), and served the parties with the
27 report, the parties will have ten (10) judicial days after service of the report to file and
28 serve a motion, with supporting evidence, including expert witness testimony/report and/or

1 declarations of witnesses, concerning any suggested revisions to the Special Masters'
2 report (including proposed maps). The parties shall have five (5) judicial days after
3 service to respond to other parties' motion. The parties shall have five (5) judicial days
4 after service of the responses to file and serve a reply.

5 IT IS FURTHER ORDERED that the Court may hold a hearing on the parties'
6 motions to revise the Special Masters' report within ten (10) days after the replies are due.

7 IT IS FURTHER ORDERED that the Court will take appropriate action based on
8 the Special Masters' report and the evidence presented by the parties, which may include a
9 subsequent referral to the Special Masters or a final determination on any matter by the
10 Court.

11 **4. Discovery procedures.**

12 IT IS ORDERED that Discovery will be allowed subject to NRCP 26, but the Court
13 cautions the parties that timing and efficiency are critical in this case. The Court does not
14 see the need for discovery among the parties other than the expert reports and testimony
15 indicated above. The Court admonishes the parties to act accordingly and not to
16 needlessly delay the case or engage in unnecessary discovery. Any discovery disputes
17 shall be heard on an expedited basis by the Court.

18 DATED this 4th day of August, 2011.

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20 
21 JAMES T. RUSSELL
22 District Court Judge
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25
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27
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**A GUIDE
TO
STATE AND CONGRESSIONAL REDISTRICTING
IN
NEW MEXICO**

2011

**Prepared by the
New Mexico Legislative Council Service
Room 411, State Capitol
Santa Fe, New Mexico
April 2011**

.187014

EXHIBIT 3

GUIDELINES FOR THE DEVELOPMENT OF STATE AND CONGRESSIONAL REDISTRICTING PLANS

WHEREAS, it is incumbent on the New Mexico legislative council to issue redistricting guidelines that articulate principles based on federal and state law and the prior experience of this legislature; and

WHEREAS, such guidelines are necessary to assist the appropriate legislative committees involved in redistricting in the development and evaluation of redistricting plans following the 2010 decennial census; and

WHEREAS, such guidelines are also intended to help facilitate the completion of the redistricting process before the nominating petitions are first made available in October 2011 for the 2012 primary election;

NOW, THEREFORE, IT IS HEREBY RESOLVED that the New Mexico legislative council adopt the following redistricting guidelines with the intent that the appropriate legislative committees involved in redistricting use them to develop and evaluate redistricting plans.

- 1. Congressional districts shall be as equal in population as practicable.**
- 2. State districts shall be substantially equal in population; no plans for state office will be considered that include any district with a total population that deviates more than plus or minus five percent from the ideal.**
- 3. The legislature shall use 2010 federal decennial census data generated by the United States bureau of the census.**
- 4. Since the precinct is the basic building block of a voting district in New Mexico, proposed redistricting plans to be considered by the legislature shall not be comprised of districts that split precincts.**
- 5. Plans must comport with the provisions of the Voting Rights Act of 1965, as amended, and federal constitutional standards. Plans that dilute a protected minority's voting strength are unacceptable. Race may be considered in developing redistricting plans but shall not be the predominant consideration. Traditional race-neutral districting principles (as reflected in paragraph seven) must not be subordinated to racial considerations.**
- 6. All redistricting plans shall use only single-member districts.**
- 7. Districts shall be drawn consistent with traditional districting principles. Districts shall be composed of contiguous precincts, and shall be reasonably compact. To the extent feasible, districts shall be drawn in an attempt to preserve communities of interest and shall take into consideration political and geographic boundaries. In addition, and to the extent feasible, the legislature may seek to preserve the core of existing districts, and may consider the residence of incumbents.**

**Adopted by the New Mexico legislative council
January 17, 2011**

STATE OF NEW MEXICO
COUNTY OF SANTA FE
FIRST JUDICIAL DISTRICT COURT

CAUSE NO. D-101-CV-2011-02942

BRAIN F. EGOLF, JR., HAKIM BELLAMY, MEL HOLGUIN, MAURILIO CASTRO and
ROXANE SPRUCE BLY,

Plaintiffs,

-vs-

DIANNA J. DURAN, in her official capacity as New Mexico Secretary of State, SUSANA MARTINEZ, in her official capacity as New Mexico Governor, JOHN A. SANCHEZ, in his official capacity as New Mexico Lieutenant Governor and presiding officer of the New Mexico Senate, TIMOTHY Z. JENNINGS, in his official capacity as President Pro-Tempore of the New Mexico Senate, and BEN LUJAN SR., in his official capacity as Speaker of the New Mexico House of Representatives,

Defendants.

**CONSOLIDATED WITH CAUSE NOS.: D-101-CV-2011-02944; D-101-CV-2011-03016;
D-101-CV-2011-03099; D-101-CV-2011-03107; D-101-CV-2011-02945; D-506-CV-2011-00913;
D-202-CV-2011-09600**

**ORDER GRANTING MOTION TO APPOINT SPECIAL MASTER AND ADOPTING
PROCEDURAL DEADLINES**

THIS MATTER comes before the Court on the James Plaintiffs' Motion for Appointment of Special Master. The Court has reviewed the motion and the responses thereto, and finds that the motion is well taken and will be granted. Now, Therefore,

IT IS ORDERED BY THE COURT THAT:

1. Each party may submit the name of a proposed special master and his or her resumes to the Court by no later than Thursday, October 27, 2011. By no later than the same date, each party also may submit proposed instructions to the special master and supporting authority.

EXHIBIT 4

2. Parties may submit responses to other parties' proposed special masters by no later than Friday, October 28, 2011

3. The Court will appoint a special master on or before Friday, November 4, 2011. Counsel for Defendants Lujan and Jennings are directed to provide the special master immediately thereafter with maps and statistical information regarding the existing (i.e., since 2002) Congressional, House, Senate and PRC plans that the Legislative Council Service prepared in advance of the recent special session, as well as the maps and statistical information that that agency prepared in connection with the plans that were proposed during the session.

4. The special master will be directed to submit to the Court and the parties Congressional, House, Senate and PRC districting plans by Wednesday, November 30, 2011.

5. The parties may submit proposed plans and written analysis to the special master by no later than Monday, November 14, 2011. The parties may submit analysis responsive to the other parties' submissions by no later than Monday, November 21, 2011.

6. The Court will hold hearings during the week of December 5-9, 2011, at which the parties will be afforded an opportunity to present evidence and/or argument in support of or opposition to the special master's plans, including any proposed modifications to them.

7. The parties may submit written final argument and proposed findings of fact and conclusions of law by no later than December 15, 2011.

8. The Court will issue its findings and conclusions, including adoption of plans and maps for Congressional, House, Senate and PRC districts, on or before January 6, 2012.

HONORABLE JAMES HALL
FIRST JUDICIAL DISTRICT COURT

PARTIES ENTITLED TO NOTICE:

Robert M. Doughty, III
Judd C. West
Doughty & West, P.A.
20 First Plaza NW, Suite 412
Albuquerque, NM 87102
(505) 242-7070
rob@doughtywest.com
volanda@doughtywest.com

Attorney for Defendants Dianna J Duran, in her official capacity as New Mexico Secretary of State and John A. Sanchez, in his official capacity as New Mexico Lieutenant Governor and presiding officer of the New Mexico Senate

Paul J. Kennedy
201 12th Street NW
Albuquerque NM 87102-1815
(505) 842-0653
pkennedy@kennedyhan.com

Jessica Hernandez
Matthew J. Stackpole
Office of the Governor
490 Old Santa Fe Trail #400
Santa Fe, NM 87401-2704
(505) 476-2200
jessica.hernandez@state.nm.us
matthew.stackpole@state.nm.us

Attorneys for Defendant Susana Martinez, in her official capacity as New Mexico Governor

Ray M. Vargas, II
David P. Garcia
Erin B. O'Connell
Garcia & Vargas, LLC
303 Paseo del Peralta
Santa Fe, NM 87501
(505) 982-1873
ray@garcia-vargas.com
david@garcia-vargas.com
erin@garcia-vargas.com

Joseph Goldberg
John W. Boyd
David H. Urias
Sara K. Berger Freedman
Boyd Hollander
Goldberg & Ives
20 First Plaza Ctr. NW. #700
Albuquerque, NM 87102
(505) 842-9960
jg@fbdlaw.com
jwb@fbdlaw.com
dhu@fbdlaw.com
skb@fbdlaw.com

Attorneys for Plaintiffs in Egolf v. Duran, D-101-CV-2011-02942; Holguin v. Duran, D-101-CV-2011-0944; and Castro v. Duran, D-101-CV-2011-02945

Patrick J. Rogers
Modrall, Sperling, Roehl, Harris & Sisk P A
P.O. Box 2168
Albuquerque, NM 87103
(505) 848-1849
pir@modrall.com

Attorneys for Plaintiffs in Sena v. Duran, D-506-CV-2011-00913

Casey Douma
Attorney at Law
PO Box 812
Laguna NM 87026-0812
(505) 552-5776
cdouma@lagunatribe.org

Teresa Leger
Nordhaus Law Firm LLP
1239 Paseo de Peralta
Santa Fe NM 87501-2758
(505) 982-3622
tleger@nordhauslaw.com

Cynthia Kiersnowski
Nordhaus Law Firm LLP
1239 Paseo de Peralta
Santa Fe NM 87501-2758
(505) 982-3622
ckiersnowski@nordahuslaw.com

Attorneys for Plaintiffs in Pueblo of Laguna v. Duran, D-101-CV-2011-03016

David K. Thomason
Thomason Law Firm
303 Paseo de Peralta
Santa Fe NM 87501-1860
(505) 982-1873
david@thomasonlawfirm.net

Attorney for Plaintiffs in Maestas v. Duran, D-101-CV-2011-03099 and Maestas v. Duran, D-101-CV-2011-03107

Stephen G. Durkovich
Law Office of Stephen Durkovich
534 Old Santa Fe Trail
Santa Fe, NM 87505-0372
(505) 986-1800
romero@durkovich.com

John V. Wertheim
Jones, Snead, Wertheim & Wentworth, P.A.
PO Box 2228
Santa Fe, NM 87505-2228
(505) 982-0011
johnv@thejonesfirm.com
Attorneys for Plaintiffs in Maestas v. Duran, D-101-CV-2011-03107

Luis G. Stelzner
Sara N. Sanchez
Stelzner, Winter, Warburton, Flores, Sanchez & Dawes, P.A.
PO Box 528
Albuquerque NM 87103
(505) 988-7770
lgs@stelznerlaw.com
ssanchez@stelznerlaw.com

Richard E. Olson
Jennifer M. Heim
Hinkle, Hensley, Shanor & Martin, PLP
PO Box 10
Roswell NM 88202-0010
(575) 622-6510
rolson@hinklelawfirm.com
jheim@hinklelawfirm.com

Attorneys for Defendants Timothy J. Jennings, in his official capacity as President Pro-Tempore of the New Mexico Senate and Ben Lujan, Jr., in his official capacity as Speaker of the New Mexico House of Representatives