

STATE OF NEW MEXICO
COUNTY OF LEA
FIFTH JUDICIAL DISTRICT COURT

REPUBLICAN PARTY OF NEW MEXICO,
DAVID GALLEGOS, TIMOTHY JENNINGS,
DINAH VARGAS, MANUEL GONZALES, JR.,
BOBBY AND DEE ANN KIMBRO, and
PEARL GARCIA,

Plaintiffs,

v.

MAGGIE TOULOUSE OLIVER in her official
capacity as New Mexico Secretary of State,
MICHELLE LUJAN GRISHAM in her official
capacity as Governor of New Mexico, HOWIE
MORALES, in his official capacity as New
Mexico Lieutenant Governor and President of the
New Mexico Senate, MIMI STEWART in her
official capacity as President Pro Tempore of the
New Mexico Senate, and JAVIER MARTINEZ in
his official capacity as Speaker of the New Mexico
House of Representatives,

Defendants,

and

THE DEMOCRATIC PARTY OF NEW
MEXICO,

[Proposed] Intervenor-Defendant.

No. D-506-CV-202200041
Judge Fred T. Van Soelen

DEMOCRATIC PARTY OF NEW MEXICO'S [PROPOSED] WITNESS LIST¹

¹ DPNM submits this witness list in compliance with the court's July 24, 2023 Scheduling Order while awaiting the resolution of its Expedited Motion to Intervene. Because DPNM is not yet a party to this case, it has not participated in the exchange of documents or other discovery. DPNM accordingly reserves the right to amend this proposed witness list should it be granted intervention in this case.

The Democratic Party of New Mexico (“DPNM”) may call any of the following fact witnesses to testify via affidavit, at a deposition, and/or at trial:

1. Parties to this litigation and/or their designated representative(s)
2. Clara Padilla Andrews
3. Kathy Duffy
4. Matthew Gonzales
5. Ted Jojola
6. Luz Maldonado
7. Mary-Parr Sanchez
8. Christina Serna
9. Steve Sianez
10. Witnesses who testified in favor of S.B. 1 or Map Concept H, or against Map Concept E, before the Citizens Redistricting Commission, Senate Rules Committee, Senate Judiciary Committee, and/or House State Government and Indian Affairs Committee.
11. Witnesses whose identities and/or significance are not yet known to DPNM, including those identified over the course of discovery.
12. Witnesses disclosed on the witness list of any other party to this litigation.

In addition to the fact witnesses named above, DPNM intends to call the following witnesses to give expert testimony in this matter:

1. Christopher S. Warshaw
2. Any witness disclosed as a fact witness above who, while not retained as an expert, may give expert testimony that is incidental to his or her fact testimony.
3. Any expert witness disclosed by any other party to this litigation.

Dated: August 10, 2023

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**Pro Hac Vice*

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing instrument will be served on all counsel via the e-filing system on this the 10th day of August, 2023 as well as emailed to all parties of record.

/s/ Justin R. Kaufman _____