

STATE OF NEW MEXICO  
COUNTY OF LEA  
FIFTH JUDICIAL DISTRICT COURT

FILED  
5th JUDICIAL DISTRICT COURT  
Lea County  
8/23/2023 4:03 PM  
NELDA CUELLAR  
CLERK OF THE COURT  
Cory Hagedoorn

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

Plaintiffs,

vs.

Case No. D-506-CV-2022-00041

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.

AMENDED NOTICE OF DEPOSITION OF SEAN P. TRENDE

To: Sean P. Trende  
c/o Carter B. Harrison, IV, Esq.  
Harrison & Hart, LLC  
924 Park Ave. SW, Suite E  
Albuquerque, NM 87102  
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[carter@harrisonhartlaw.com](mailto:carter@harrisonhartlaw.com)

PLEASE TAKE NOTICE that Defendants, Mimi Stewart and Javier Martinez, will  
take the deposition of **SEAN P. TRENDE**, by oral examination on **Wednesday, September 6,**  
**2023**, commencing at **9:00 a.m. MST**, and continuing thereafter until completed or

recessed, *via Zoom*. This deposition will be taken before a certified court reporter and videographer. Pursuant to Rule 1-032 New Mexico Rules of Civil Procedure, the deposition may be used at trial. The deposition may be recorded by sound, sound-and-visual, or stenographic means. The deposition shall be used for discovery purposes, and pursuant to Rule 1-032(A) NMRA, may be introduced as evidence at the trial of the above-entitled action or for any and all purposes permitted by the New Mexico Rules of Civil Procedure or the New Mexico Rules of Evidence.

This deposition will be conducted via video conference.

Respectfully submitted,

**HINKLE SHANOR LLP**

By: 

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*Attorneys for Mimi Stewart and Javier Martinez*

**CERTIFICATE OF SERVICE**

Pursuant to Rule 1-005(E) NMRA, the foregoing *Amended Notice of Deposition of Sean P. Trende* was served on the following on August 23, 2023, by the method reflected:

Person Served

Method

All Counsel of Record

E-File/E-Service and E-Mail

By: /s/ Lucas M. Williams

Lucas M. Williams

Richard E. Olson

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*Attorneys for Mimi Stewart and Javier Martinez*