

FILED
5th JUDICIAL DISTRICT COURT
Lea County
9/6/2023 10:03 AM
NELDA CUELLAR
CLERK OF THE COURT
Cory Hagedoorn

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 DEANN KIMBRO, and
PEARL GARCIA,

Plaintiffs,

vs.

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 BRIAN EGOLF in his official
capacity as Speaker of the New Mexico House of
Representatives,

Defendants

CERTIFICATE OF SERVICE

Plaintiffs, by and through their undersigned counsel, certify that on September 6, 2023,
Notices of Videotaped Deposition for Scott C. Forrester and Kyra E. Ellis-Moore, attached as
Exhibit A, were served by email, on the following counsel, along with a copy of this Certificate of
Service:

Sara N. Sanchez
Mark T. Baker
**PEIFER, HANSON, MULLINS
& BAKER P.A.**
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Counsel for Legislative Defendants

Richard E. Olson
Lucas M. Williams
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rolson@hinklelawfirm.com
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atripp@hinklelawfirm.com
Counsel for Legislative Defendants

Respectfully submitted,

/s/ Carter B. Harrison IV

Carter B. Harrison IV
HARRISON & HART, LLC
924 Park Ave SW, Suite E
Albuquerque, NM 87102
(505) 295-3261
carter@harrisonhartlaw.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I certify that the foregoing was electronically filed and served via the State of New Mexico's Tyler/Odyssey E-File & Serve System on September 6, 2023, which caused service upon all parties through counsel of record.

/s/ Carter B. Harrison IV

Carter B. Harrison IV

STATE OF NEW MEXICO
COUNTY OF LEA
FIFTH JUDICIAL DISTRICT COURT

REPUBLICAN PARTY OF NEW MEXICO,
DAVID GALLEGOS, TIMOTHY JENNINGS,
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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.

NOTICE TO TAKE VIDEOTAPED DEPOSITION

TO: **Scott C. Forrester**

Lucas M. Williams	Sara N. Sanchez
Richard E. Olson	Mark T. Baker
Ann C. Tripp	PEIFFER, HANSON, MULLINS & BAKER P. A.
HINKLE SHANOR LLP	mbaker@peiferlaw.com
rolson@hinklelawfirm.com	ssanchez@peiferlaw.com
lwilliams@hinklelawfirm.com	
atripp@hinkelawfirm.com	

PLEASE TAKE NOTICE that Plaintiffs, by and through undersigned counsel, will take the videotaped deposition of **Scott C. Forrester**, on **Monday, September 11, 2023, beginning at 8:00 a.m.**, and continuing until completed before a certified court reporter. This deposition will be conducted via Zoom, and the information necessary for joining the deposition will be provided to all parties by the court reporter.

Notice is further given that Pursuant to Rule 1-032(A)(3)(c) NMRA, the Plaintiffs intend to use this deposition at trial.

Respectfully submitted,

/s/ Carter B. Harrison IV

Carter B. Harrison IV
HARRISON & HART, LLC
924 Park Ave SW, Suite E
Albuquerque, NM 87102
(505) 295-3261
carter@harrisonhartlaw.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I certify that the foregoing was served via email to counsel on September 6, 2023.

/s/ Carter B. Harrison IV

Carter B. Harrison IV

STATE OF NEW MEXICO
COUNTY OF LEA
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MORALES in his official capacity as New
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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.

NOTICE TO TAKE VIDEOTAPED DEPOSITION

TO: **Kyra E. Ellis-Moore**

Lucas M. Williams	Sara N. Sanchez
Richard E. Olson	Mark T. Baker
Ann C. Tripp	PEIFFER, HANSON, MULLINS & BAKER P.A.
HINKLE SHANOR LLP	mbaker@peiferlaw.com
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lwilliams@hinklelawfirm.com	
atripp@hinklelawfirm.com	

PLEASE TAKE NOTICE that Plaintiffs, by and through undersigned counsel, will take the videotaped deposition of **Kyra E. Ellis-Moore**, on **Wednesday, September 13, 2023, beginning at 8:00 a.m.**, and continuing until completed before a certified court reporter. This deposition will be conducted via Zoom, and the information necessary for joining the deposition will be provided to all parties by the court reporter.

Notice is further given that Pursuant to Rule 1-032(A)(3)(c) NMRA, the Plaintiffs intend to use this deposition at trial.

Respectfully submitted,

/s/ Carter B. Harrison IV

Carter B. Harrison IV
HARRISON & HART, LLC
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Albuquerque, NM 87102
(505) 295-3261
carter@harrisonharlaw.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

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/s/ Carter B. Harrison IV

Carter B. Harrison IV