

**STATE OF NEW MEXICO
COUNTY OF LEA
FIFTH JUDICIAL DISTRICT**

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

Plaintiffs,

v.

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

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

Defendants.

**LEGISLATIVE DEFENDANTS' AND NON-PARTY LEGISLATORS' NOTICE OF
OBJECTIONS AND CERTIFICATE OF SERVICE
FOR SUPPLEMENTAL DOCUMENT PRODUCTION**

COME NOW Defendant Javier Martinez in his official capacity as Speaker of the House of Representatives of the State of New Mexico, and Defendant Mimi Stewart, in her official capacity as President Pro-Tempore of the New Mexico Senate (together, the "Legislative Defendants") and Non-Party Legislators Senator Joseph Cervantes, Senator Peter Wirth and Former Speaker Brian Egolf, and give notice that, pursuant to the Court's Decision Letter dated September 26, 2023, and subsequent oral clarifications and rulings by the Court during the bench trial held in this matter on September 27 and 28, 2023, the Legislative Defendants and Non-Party

Legislators have made their supplemental document production to counsel for Plaintiffs on this date, October 2, 2023.

The Legislative Defendants and Non-Party Legislators make this supplemental document production subject to their previously stated objections and assertions of legislative privilege under Article IV, Section 13 of the New Mexico Constitution, as set forth in the Legislative Defendants' multiple motions to quash discovery and trial subpoenas filed in this matter and arguments presented by counsel to the Court at the motions hearing on September 25, 2023 and at trial on September 27 and 28, 2023. It is the position of the Legislative Defendants and Non-Party Legislators that the legislative privilege conferred by art. IV, § 13 of the New Mexico Constitution extends to legislators' (and their staffers' and consultants') communications to and from third parties who play a role in the legislative process, regardless of those third parties' official title or payroll information.

Subject to those objections, the undersigned hereby certifies that counsel for the Legislative Defendants and Non-Party Legislators served their Supplemental Document Production, together with this Notice of Objections and Certificate of Service, by email only, on the 2nd day of October, 2023, on the following:

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2023 I caused the foregoing Notice and Certificate of Service, along with this Certificate of Service, to be served and filed electronically through the Tyler Technologies Odyssey File & Serve electronic filing system, which caused all parties or counsel of record to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

PEIFER, HANSON, MULLINS & BAKER, P.A.

By: /s/ Sara N. Sanchez
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