

**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.

**NOTICE OF RULE 1-030(B)(6) DEPOSITION**

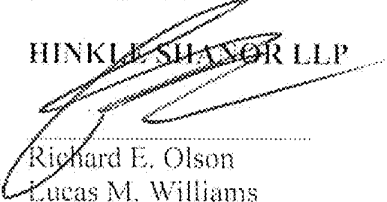
**TO: Republican Party of New Mexico**  
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PLEASE TAKE NOTICE that beginning at the hour of 9:00 a.m. on September 1, 2023,  
by Zoom, and continuing from day to day thereafter until completed, Defendants will take the oral  
deposition of a person or persons designated by Plaintiff Republican Party of New Mexico  
pursuant to Rule 1-030(B)(6) NMRA to testify on its behalf as to all facts known or reasonably  
available to Plaintiff Republican Party of New Mexico regarding the matters described in TOPICS

attached hereto, upon oral examination pursuant to the New Mexico Rules of Civil Procedure before a certified court reporter. Notice is further given that this deposition testimony may be used at trial and for any and all purposes permitted by the Rules of Civil Procedure and the Rules of Evidence.

Respectfully submitted,

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TOPICS

1. The identities of any consultants used by the Republican Party of New Mexico or its members in the New Mexico Legislature to assist in the design or development of redistricting plans or maps for the 2021 special session.
2. The participation of the Republican Party of New Mexico or its members in the Citizens Redistricting Committee process, including the submission of any proposals, comments or maps, and attendance or comments at any public hearings.
3. Communications by the Republican Party of New Mexico or its members to any members of the New Mexico Legislature on the topic of congressional districting in 2021, during or before the passage of SB-1.
4. The reasons and bases for the Republican Party of New Mexico's support of the Court's adoption of the "Concept E" Map.
5. Historical and current trends in Republican Party registration and voter performance in New Mexico.
6. The voter turnout and election outcome in CD-2 during the 2022 congressional election.
7. The importance of the extractive energy industry to the economy of New Mexico and to the strength of the Republican Party of New Mexico.
8. The Republican Party of New Mexico's objections to SB-1.
9. The witnesses to be presented in this matter and the testimony anticipated from each.

CERTIFICATE OF SERVICE

I hereby certify that on August 23, 2023, I caused the foregoing Notice 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.

HINKLE SHANOR LLP

