

FILED
5th JUDICIAL DISTRICT COURT
Lea County
9/12/2023 12:39 PM
NELDA CUELLAR
CLERK OF THE COURT
Cory Hagedoorn

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 COMPLETION OF BRIEFING ON
LEGISLATIVE DEFENDANTS' EXPEDITED MOTION FOR
ENTRY OF PRE-TRIAL ORDER TO PREVENT TRIAL BY AMBUSH**

COME NOW Legislative Defendants by and through their counsel of record and hereby give notice that briefing is complete on Legislative Defendants' Expedited Motion for Entry of Pre-Trial Order to Prevent Trial by Ambush. The following documents were filed with the Court in connection with this Motion:

09/05/2023 Legislative Defendants' Expedited Motion for Entry of Pre-Trial Order to Prevent Trial by Ambush;

09/05/2023 Plaintiffs' Opposition to Legislative Defendants' Expedited Motion for Entry of Pre-Trial Order; and

09/12/2023 Reply in Support of Legislative Defendants' Expedited Motion for Entry of Pre-Trial Order to Prevent Trial by Ambush.

Respectfully submitted,

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

By: /s/ Sara N. Sanchez

Sara N. Sanchez
20 First Plaza, Suite 725
Albuquerque, NM 87102
505-247-4800
ssanchez@peiferlaw.com

HINKLE SHANOR LLP

Richard E. Olson
Lucas M. Williams
P.O. Box 10
Roswell, NM 88202-0010
575-622-6510 / 575-623-9332 Fax
rolson@hinklelawfirm.com
lwilliams@hinklelawfirm.com

STELZNER, LLC

Luis G. Stelzner, Esq.
3521 Campbell Ct. NW
Albuquerque NM 87104
505-263-2764
pstelzner01@gmail.com

Professor Michael B. Browde
751 Adobe Rd., NW
Albuquerque, NM 87107
505-266-8042
mbrowde@me.com

Attorneys for the Legislative Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was submitted for e-filing and service through the District Court's "Odyssey File & Serve" filing system this 12th day of September 2023, which caused all counsel of record to be served by electronic means or as otherwise stated, as more fully reflected on the Notification of Service.

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

By: /s/ Sara N. Sanchez
Sara N. Sanchez