

FILED  
5th JUDICIAL DISTRICT COURT  
Lea County  
8/28/2023 3:02 PM  
NELDA CUELLAR  
CLERK OF THE COURT  
Sandy Long

**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.

**JOINDER IN LEGISLATIVE DEFENDANTS' MOTION TO QUASH SUBPOENAS  
FOR DEPOSITION AND FOR PROTECTIVE ORDER**

**COMES NOW** Senator Daniel Ivey-Soto, by and through undersigned counsel pursuant to the Limited Entry of Appearance on Behalf of the Non-Party Citizen Legislators, filed August 7, 2023, and hereby joins in the *Legislative Defendants' Motion to Quash Subpoenas for Deposition and for Protective Order* that was filed on August 16, 2023, in support of his assertion of legislative privilege pursuant to Article IV, Section 13 of the New Mexico Constitution. A Notice of Non-Appearance for the deposition subpoenaed and noticed by Plaintiffs for August 29, 2023, is filed concurrently herewith.

Respectfully submitted:

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

*/s/ Sara N. Sanchez*

Sara N. Sanchez  
20 First Plaza, Suite 725  
Albuquerque, NM 87102  
505-247-4800  
[ssanchez@peiferlaw.com](mailto:ssanchez@peiferlaw.com)

**HINKLE SHANOR LLP**

Richard E. Olson  
Lucas M. Williams  
Ann C. Tripp  
P.O. Box 10  
Roswell, NM 88202-0010  
575-622-6510 / 575-623-9332 Fax  
[rolson@hinklelawfirm.com](mailto:rolson@hinklelawfirm.com)  
[lwilliams@hinklelawfirm.com](mailto:lwilliams@hinklelawfirm.com)  
[atripp@hinklelawfirm.com](mailto:atripp@hinklelawfirm.com)

**STELZNER, LLC**

Luis G. Stelzner, Esq.  
3521 Campbell Ct. NW  
Albuquerque NM 87104  
505-263-2764  
[pstelzner@aol.com](mailto:pstelzner@aol.com)

**Professor Michael B. Browde**

751 Adobe Rd., NW  
Albuquerque, NM 87107  
505-266-8042  
[mbrowde@me.com](mailto:mbrowde@me.com)

*Attorneys for the Non-Party Citizen Legislators  
Pursuant to Limited Entry of Appearance*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 28, 2023 I caused the foregoing Joinder, 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  
Sara N. Sanchez