

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

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AMERICAN ASSOCIATION OF PEOPLE)
WITH DISABILITIES, FEDERATION OF)
WOMEN'S CLUBS OVERSEAS, INC., NEW)
MEXICO PUBLIC INTEREST RESEARCH)
GROUP EDUCATION FUND, and)
SOUTHWEST ORGANIZING PROJECT,)
)
Plaintiffs,)
)
v.) No. CIV 08-00702 JOB
)
MARY HERRERA, in her capacity as)
Secretary of State,)
)
Defendant.)
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**PLAINTIFFS' UNOPPOSED MOTION TO EXTEND THE DEADLINE TO FILE
A JOINT STATUS REPORT AND PROVISIONAL DISCOVERY PLAN AND TO
RESCHEDULE THE RULE 16 CONFERENCE WITH THE COURT**

Plaintiffs, by counsel, respectfully move the Court pursuant to D.N.M.LR-Civ. 7.2 and 16.1 for leave to extend the deadline to file a Joint Status Report and Provisional Discovery Plan from October 17, 2008 to November 17, 2008. Plaintiffs also move for leave to reschedule the Rule 16 conference with the Court from October 23, 2008 to November 24, 2008, or as soon thereafter as this matter may be heard. Good cause exists for extending the deadline to file the Joint Status Report and Provisional Discovery Plan and, accordingly, to reschedule the Rule 16 conference, as is set forth with greater particularity below:

1. The parties agree that further discussion is necessary before the Joint Status Report and Provisional Discovery Plan can be filed and, given the difficult schedules and obligations of the parties and counsel between now and the general election scheduled for November 4, 2008, a one-month extension is necessary.

2. While the issues raised by Plaintiffs' Complaint continue to be important, the parties agree that little progress can be made in this litigation between now and November 4, 2008. Thereafter, the parties agree to work together on a discovery plan.

3. Defendant does not oppose this motion.

WHEREFORE, pursuant to D.N.M.LR-Civ. 7.2 and 16.1, Plaintiffs request that the Court enter an order allowing the parties to extend the deadline to file the Joint Status Report and Provisional Discovery Plan to November 17, 2008 and, accordingly, to reschedule the Rule 16 conference with this Court for November 24, 2008, or as soon thereafter as this matter may be heard.

Respectfully submitted,

Dated: Albuquerque, New Mexico
October 7, 2008

FREEDMAN BOYD HOLLANDER GOLDBERG &
IVES P.A.

By: /s/ John W. Boyd

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I certify that on the 7th day of October, 2008, I filed the foregoing electronically through the CM/ECF system, which caused the following counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Scott Fuqua
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/s/ David H. Urias
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