

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

	x	
	)	
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.	)	
	)	
	)	
	)	
	)	
	x	

**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 April 17, 2009 to June 16, 2009. Plaintiffs also move for leave to reschedule the Rule 16 conference with the Court from April 24, 2009 to June 19, 2009, 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. Because of a conflict with a previous client, which is not a party to this litigation, current counsel learned in the last ten days that they must withdraw from

representation of plaintiffs in this case. The conflict does not reflect negatively on any of the plaintiffs. Current counsel is actively searching for substitute counsel, and hopes that substitute counsel can appear in the case within the next sixty days.

3. This is plaintiffs' fourth request for an extension.
4. 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 June 16, 2009 and, accordingly, to reschedule the Rule 16 conference with this Court for June 19, 2009, or as soon thereafter as this matter may be heard.

Respectfully submitted,

Dated: Albuquerque, New Mexico  
April 15, 2009

FREEDMAN BOYD HOLLANDER GOLDBERG  
& IVES P.A.

By: /s/ John W. Boyd  
John W. Boyd  
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*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I certify that on the 15<sup>th</sup> day of April, 2009, 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:

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/s/ David H. Urias  
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