

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 LH/WDS
	)	
MARY HERRERA, in her capacity as	)	
Secretary of State,	)	
	)	
Defendant.	)	
	)	
	)	
	)	
	)	
_____	x	

**UNOPPOSED MOTION TO EXCEED PAGE LIMITS FOR  
MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF  
PLAINTIFFS’ APPLICATION FOR A PRELIMINARY  
INJUNCTION AND EXHIBITS THERETO**

Plaintiffs, by counsel, respectfully move the Court pursuant to D.N.M.LR-Civ. 7.7 for leave to file a fifty page Memorandum of Points and Authorities in Support of Plaintiffs’ Application for a Preliminary Injunction, and for leave to file sixty pages of attached exhibits. Good cause exists for extending the page limits, as is set forth with greater particularity below:

1. The instant action involves four different plaintiffs, each alleging distinct injuries resulting from a complex regulatory scheme that includes statutory, administrative, and de facto requirements imposed upon Plaintiffs. Moreover, Plaintiffs

in this action assert a number of different legal claims arising under the United States Constitution, federal statutory law, and the New Mexico Constitution. The constitutional claims alone require reference to extensive bodies of law relating to election regulations, the freedom of speech and the freedom of association.

2. Plaintiffs propose to include a total of five affidavits from representatives of each Plaintiff, affidavits that detail the nature of each organization's voter-registration work and the impact of the challenged law on that work. Plaintiffs further propose to include a short report prepared by a Yale Political Science Professor with broad experience in campaigns, elections, and voter behavior. Plaintiffs further propose to include a short attorney affidavit attesting to certain facts that may bear on the Court's consideration of the application.

3. Plaintiffs believe that inclusion of the above-referenced materials is necessary to allow them to demonstrate that they are entitled to the emergency relief that they seek here. In particular, Plaintiffs believe that the additional pages of briefing and exhibits are necessary to establishing likelihood of success on the merits, the existence of irreparable harm absent issuance of injunctive relief, that the ongoing and threatened injuries to Plaintiffs outweigh any damage that injunctive relief might cause Defendant, and that issuance of injunctive relief is not contrary to the public interest.

4. Defendant does not oppose this request.

WHEREFORE, pursuant to D.N.M.LR-Civ. 7.7, Plaintiffs request that the Court enter an order allowing Plaintiffs to file a Memorandum of Points and Authorities not exceeding fifty pages, along with corresponding exhibits not exceeding sixty pages.

Respectfully submitted,

Dated: Albuquerque, New Mexico  
July 30, 2008

FREEDMAN BOYD HOLLANDER GOLDBERG &  
IVES P.A.

By: /s/ John W. Boyd

John W. Boyd

David H. Urias

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*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I certify that on the 30th day of July, 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:

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/s/ David H. Urias  
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