

# **AFFIDAVITS**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

CELIA VALDEZ, *et al.*,

Plaintiffs,

v.

MARY HERRERA, *et al.*,

Defendants.

CIVIL ACTION NO. CV-09-668 JCH/DJS

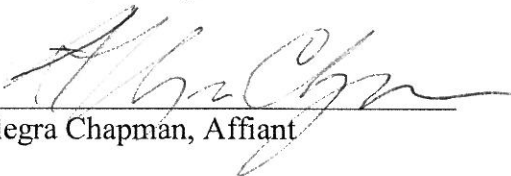
**FOUNDATIONAL AFFIDAVIT OF  
ALLEGRA CHAPMAN**

Affiant states and affirms as follows:

1. My name is Allegra Chapman. I am an attorney with the non-profit organization Demos. I am admitted to practice *pro hac vice* in the State of New Mexico and am an attorney of record for Plaintiffs Celia Valdez, Graciela Grajeda, Shawna Allers, and Jesse Rodriguez.
2. I am providing this Affidavit as foundation for several exhibits in support of Plaintiffs' Controverting and Separate Statement of Facts in Support of Plaintiffs' Response to Defendant HSD's Motion for Summary Judgment. This Affidavit is entered only for the purpose of attesting that the following documents are true and correct copies.
3. I know that Exhibit 1 is a true and correct copy of excerpts of the transcript of the deposition of Ted Roth, which took place on February 24, 2010 in Albuquerque, New Mexico. I personally deposed Mr. Roth.

4. I know that Exhibit 3 is a true and correct copy of excerpts of the transcript of the deposition of Cindy M. Salazar, which took place on May 5, 2010 in Las Cruces, New Mexico. I personally deposed Ms. Salazar.
5. I know that Exhibit 6 is a true and correct copy of excerpts of the transcript of the deposition of Dorothy Fisher, which took place on May 5, 2010 in Las Cruces, New Mexico. I attended the deposition of Ms. Fisher.

I declare the above under penalty of perjury this 9th day of July, 2010.

  
Allegra Chapman, Affiant

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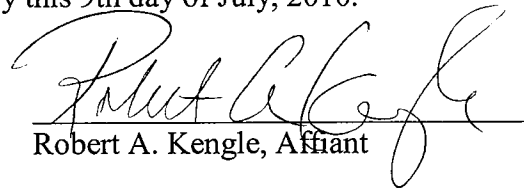
**FOUNDATIONAL AFFIDAVIT OF  
ROBERT A. KENGLE**

Affiant states and affirms as follows:

1. My name is Robert A. Kengle. I am an attorney with the non-profit organization Lawyers' Committee for Civil Rights Under Law. I am admitted to practice *pro hac vice* before this Court in this action and am an attorney of record for Plaintiffs Celia Valdez, Graciela Grajeda, Shawna Allers, and Jesse Rodriguez.
2. I am providing this Affidavit as foundation for several exhibits in support of Plaintiffs' Controverting and Separate Statement of Facts in Support of Plaintiffs' Response to Defendant HSD's Motion for Summary Judgment. This Affidavit is entered only for the purpose of attesting that the following documents are true and correct copies.
3. I know that Exhibit 4 is a true and correct copy of excerpts from the deposition transcript of Rochelle Sue Radloff, which took place on April 26, 2010 in Albuquerque, New Mexico. I attended Ms. Radloff's deposition in person.

4. I know that Exhibit 5 is a true and correct copy of excerpts from the deposition transcript of Rita Espinosa, which took place on April 27, 2010 in Albuquerque, New Mexico. I personally deposed Ms. Espinosa.
5. I know that Exhibit 7 is a true and correct copy of excerpts from the deposition transcript of Albert Delgado, which took place on April 26, 2010 in Albuquerque, New Mexico. I personally deposed Mr. Delgado.
6. I know that Exhibit 8 is a true and correct copy of excerpts from the deposition transcript of Roger Burton, which took place on April 29, 2010 in Farmington, New Mexico. I attended Mr. Burton's deposition in person.
7. I know that Exhibit 9 is a true and correct copy of monthly reports of agency voter registrations in New Mexico as produced during the course of the litigation by Defendants.
8. I know that Exhibit 11 is a true and correct copy of a Management Evaluation Report for SE Bernalillo County, as produced by Defendants as part of HSD and TRD's Third Set of Supplemental Discovery Responses.

I declare the above under penalty of perjury this 9th day of July, 2010.

  
Robert A. Kengle, Affiant

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**FOUNDATIONAL AFFIDAVIT OF  
BRIAN MELLOR**

Affiant states and affirms as follows:

1. My name is Brian Mellor. I am an attorney with the non-profit organization Project Vote.
2. I am providing this Affidavit as foundation for an exhibit in support of Plaintiffs' Controverting and Separate Statement of Facts in Support of Plaintiffs' Response to Defendant HSD's Motion for Summary Judgment. This Affidavit is entered only for the purpose of attesting that the following documents are true and correct copies.
3. I know that Exhibit 10 is a true and correct copy of the letter I sent to Secretary of State Mary Herrera on June 12, 2007 to notify her that the Secretary of State and the Human Services Department were not complying with Section 7 of the National Voter Registration Act of 1993.

I declare the above under penalty of perjury this 9th day of July, 2010.



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Brian Mellor, Affiant

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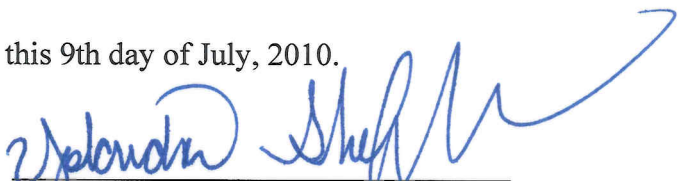
CIVIL ACTION NO. CV-09-668 JCH/DJS

**FOUNDATIONAL AFFIDAVIT OF  
YOLANDA SHEFFIELD**

Affiant states and affirms as follows:

1. My name is Yolanda Sheffield. I was an attorney with the non-profit organization Project Vote from September 2008 until July 2, 2010.
2. I am providing this Affidavit as foundation an several exhibit in support of Plaintiffs' Controverting and Separate Statement of Facts in Support of Plaintiffs' Response to Defendant HSD's Motion for Summary Judgment. This Affidavit is entered only for the purpose of attesting that the following documents are true and correct copies.
3. I know that Exhibit 2 is a true and correct copy of pages 1, 5, and 14 of the Responses of Plaintiff Shawna Allers to Defendants' First Set of Interrogatories and Requests for Production. I facilitated the completion of these responses and received final approval on its contents from Plaintiff Shawna Allers.

I declare the above under penalty of perjury this 9th day of July, 2010.

  
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Yolanda Sheffield, Affiant