

EXHIBIT 12

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

CELIA VALDEZ, *et al.*,

Plaintiffs,

v.

MARY HERRERA, *et al.*,

Defendants.

CIVIL ACTION NO. 1:09-cv-668 JCH/DJS

**JOINT STIPULATION CONCERNING HSD'S IMPLEMENTATION OF THE
NATIONAL VOTER REGISTRRTION ACT PRE-2008**

WHEREAS, Plaintiffs and Defendants Pamela S. Hyde, Fred Sandoval, and Carolyn Ingram of the New Mexico Human Services Department (collectively "HSD") have been engaged in a discovery dispute as to whether Plaintiffs may continue the prior deposition of Mr. Ted Roth, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, so as to depose another HSD official regarding HSD's voter registration policies, practices, and procedures which pre-date 2008, and

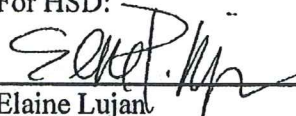
WHEREAS, Plaintiffs and HSD seek to resolve this dispute without intervention of the Court,

NOW, THEREFORE, Plaintiffs agree not to seek to continue the Rule 30(b)(6) deposition for the purpose stated above based on HSD's stipulation that the following propositions are true and correct to the best of its knowledge, following diligent investigation:

(1) No current HSD official above the level of regional manager has any superior knowledge or recollection of HSD's voter registration policies, practices, or procedures prior to 2008 than Ted Roth, and Mr. Roth testified to the full extent of his knowledge and recollection of these pre-2008 policies, practices, and procedures in his February 24, 2010 deposition; and

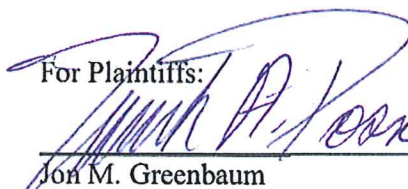
(2) HSD has produced all documents in its possession that discuss or address its voter registration policies, practices, and procedures prior to 2008.

For HSD:

 6/29/2010
Date

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