

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

DEBRA HATTEN-GONZALES, et al.,

Plaintiffs,

vs.

No. CIV 88-0385 KG/CG  
Consolidated with  
No. CIV 88-0786 KG/CG

BRENT EARNEST, Secretary of the  
New Mexico Human Services Department,

Defendant.

**Plaintiffs' Response to the Special Master's Report (Doc. 810)**

Plaintiffs file this response and specific objections to the Special Master Lawrence Parker's Report and Recommendations, dated January 1, 2018 (Doc. 810).

**I. The Special Master's Recommendations Should Be Entered as an Order of the Court**

After a year of work by the Special Master and the Compliance Specialist, Defendant's administration of the SNAP and Medicaid programs is still out of compliance with the Decree, the Special Master's past recommendations and federal law. Plaintiffs agree that Defendant has made some limited improvement in timely approval of SNAP and Medicaid applications and improved reporting on data required by the Consent Decree. However, overall timeliness of case processing is below the standards in federal law. Plaintiffs agree with the overall findings of the Special Master that there is insufficient management or program expertise and a lack of strategic planning and coordination.

Plaintiffs provide the following in support of the Special Master's recommendations:

- A. Management Changes** – Plaintiffs agree that Defendant’s management team’s decision making and communications are deficient and that key leaders should be replaced. A central problem continues to be that individuals with decision making authority do not have the knowledge or expertise to bring the administration of SNAP and Medicaid into compliance with the Decree and federal law. This is evidenced by the serious non-compliance described in the Compliance Specialist’s Report (Exhibit 5 to Doc. 810), including failure to timely process applications and renewals (pp. 3-4), persistent high rate of error in decisions to deny or terminate SNAP (p. 7), lack of uniformity in office administration (p. 9), lack of access via phone (pp. 8-9), and widely known problems with culture and management (p. 12). The Compliance Specialist also identified numerous systemic barriers to compliance that could be addressed by effective and knowledgeable leaders, including ineffective training, lack of communication between the IT staff and field offices, lack of written directives, lack of quality control reviews specific to compliance with the Decree, and insufficient worker training (pp. 13-14). This, in addition to further areas of non-compliance identified below, support the Special Master’s recommendation for changes in management.
- B. Decree Modifications and Timeliness Requirements** – Plaintiffs agree that appropriate updates to the Decree should be negotiated between the parties and progress has been made towards that end. Plaintiffs believe that the Consent Decree currently establishes an appropriate timeliness standard of removing all systemic barriers to 100% timeliness and allowing for deviation from 100% for

non-systemic reasons. Even so, Plaintiffs have proposed a revised timeliness measure for Decree compliance that accepts a standard below 100% statewide and an even lower standard for local offices. Plaintiffs will continue to work cooperatively with Defendant and the Special Master on an improved and updated Consent Decree.

- C. Worker Training and Manual** – Plaintiffs agree with the Special Master’s recommendation of specific training on the IT system, known as ASPEN, that includes current functionality and “work arounds,” as well as enhanced new employee training. Plaintiffs stress that it is critical that workers have a single comprehensive source of policy and procedures set forth in a single, statewide worker manual. Defendant committed to implementing such a manual in a letter to the Court. This was entered as an Order. *See* Doc. 712. Without a comprehensive manual practices will illegally vary from office to office and worker training will be insufficient because workers receive instructions and policy guidance from a variety of conflicting and inconsistent sources. Current worker training advises workers to reference state regulations for policy and three types of memoranda that are used for specific purposes: 1) General Information Memoranda 2) Interim Policy and Procedures, and 3) Manual Revision Memos. Defendant uses these inconsistently. For example, the Department issued a policy and procedure on over-the-counter EBT issuance as a GI, even though workers are trained that these memoranda are not used for policies and procedures. All of the memoranda are put into an unindexed shared drive and workers have no consistent way to know if there is a memorandum related to a specific topic that

they should reference. Moreover, the worker training does not contain the current status of all memoranda. In January of 2018, Plaintiffs learned that Defendant has other sources of policy called “interim business practices” and “job aides” that further describe specific application processing practices that deviate from what is already in other memoranda and state regulations. The Compliance Specialist notes that directives are also frequently given verbally and that the policy and procedures are not useful and or user friendly (p. 14).

**D. Case Review** – Plaintiffs agree that a case review is critical to both verifying some of the detailed analyses found by the Compliance Specialist in the 17 offices she reviewed in addition to determining Defendant’s compliance with the Decree and federal law. The parties are generally in agreement about a statistically significant random sample of cases selected from the four types of eligibility decisions Defendant makes: 1) SNAP applications; 2) SNAP renewals; 3) Medicaid applications; and 4) Medicaid renewals.

**E. Appointment of Qualified Experts** – Plaintiffs have long advocated for Defendant to hire staff with expertise in immigrant eligibility and SNAP and Medicaid program administration. Plaintiffs believe that the Department needs these experts to develop and implement policy for the Department, not solely as a liaison between HSD and Plaintiffs and the Special Master. This is particularly critical, as Defendant has appointed the HSD General Counsel, who has no experience administering public benefit programs, as a Deputy Secretary of the Income Support Division. Plaintiffs are concerned about Defendant’s ability to identify qualified experts, as he hired an individual to re-write the Department’s

regulations on immigrant eligibility for Medicaid who produced legally incorrect regulations that had to be fixed on an emergency basis. Defendant's staff charged with working on immigrant eligibility regulations "accidentally deleted" critical regulations that protected applicant privacy and prevented illegal calls to Immigration and Customs Enforcement. Defendant has yet to identify a qualified expert to train HSD staff on immigrant eligibility for benefits, in violation of Orders of the Court.

- F. Consequences for Non-compliance** – Plaintiffs believe that additional orders of the Court in this case should include consequences in the event Defendant does not comply.

## **II. Plaintiffs' Specific Comments and Objections**

### **A. Comments on the Compliance Specialists' Report**

1. **Timeliness:** Plaintiffs generally agree with the data cited in the Compliance Specialist's Report with a few clarifications. The Compliance Specialist reported that Defendant timely processes 90.4% of SNAP re-certifications received timely from clients in November. But, this data only applies to recertification **approvals** for clients that timely submitted their documents.<sup>1</sup> Defendant's November data for **denials** shows that just 6.6% of SNAP re-certifications are timely denied.<sup>2</sup> Plaintiffs have suggested some improved reporting on measuring timeliness of re-certifications.

Similarly, Defendant's November Medicaid renewal data shows a high rate of timely **approvals** – 97.8%.<sup>3</sup> However, the data for **denials** in the same month shows that

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<sup>1</sup> See Monthly Statistical Report November of 2017, p. 35, available at [http://www.hsd.state.nm.us/uploads/FileLinks/587930e6bdd0402c9d4990a78c041734/Nov2017\\_MSR.pdf](http://www.hsd.state.nm.us/uploads/FileLinks/587930e6bdd0402c9d4990a78c041734/Nov2017_MSR.pdf)

<sup>2</sup> See *Id.* at p. 36.

<sup>3</sup> See *Id.* at p. 17.

just 25.8% are timely denied.<sup>4</sup> A summary of Defendant's current timeliness data for denials and the size of Defendant's backlog at its peak each month is attached as Exhibit 1. In addition, Defendant does not timely provide access to expedited SNAP benefits to families where the head of household does not have a Social Security Number. This is described in more detail below.

2. **Application Registration and Screening:** The Decree requirement to screen applications the day they are received means that workers must register applications the day they are received into the system, so that they can be identified as expedite or non-expedite eligible. If an application is not registered, it has not been screened for expedited SNAP. The Compliance Specialist notes that only 64.7% of offices she reviewed timely registered applications, yet 100% timely screened applications. Compare p. 5 *Application Registration* with p. 6 *Application Screening*. Plaintiffs believe that the failure to timely register applications indicates a failure to screen for expedited eligibility.
3. **Phone Systems** – Defendant's phone system is a systemic barrier for New Mexicans seeking assistance because they cannot consistently contact the Department to report changes, complete an interview, or find information out about their case. The Compliance Specialist's report indicates that 52% of calls were abandoned for July 1, 2017 through September 1, 2017 and that the average wait times were over 27 minutes long. Data that the Plaintiffs received from Defendant show that Defendant answered only 41% of calls during this period, or had a 59% rate of call abandonment. Defendant reported receiving 120,815 calls, of which 71,866 were answered. Data from Defendant for July 1 through September 1, 2017 is attached as Exhibit 2. Currently, Defendant answers 51% of English language calls and 29% of Spanish language calls. Data show

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<sup>4</sup> See *Id.* at p. 18.

that any improvement in this number is directly attributable to a decrease in call volume rather than an improvement in performance. A summary of call center data for 2017 is attached as Exhibit 3. The Compliance Specialist's findings that Defendant does not accept messages or keep call logs in violation of the Decree cause further harm to New Mexicans who need information about their application or benefits and cannot reach the Department.

4. **Notices:** Plaintiffs are pleased that HSD is moving forward to prioritize work on notices and implement improved notices. However, as the Compliance Specialist notes, continued improvement in communication and transparency with regard to notices is necessary. While Defendant has shown progress and continues to improve notices, he has yet to provide a date by which all notices subject to the Decree will be finalized and implemented. Currently, there are major tasks that remain incomplete with regard to notices. For example, the online application has yet to undergo a review by a literacy expert. Additionally, Defendant agreed to conduct an audit of field offices to determine whether the individual offices are using notices not approved by upper management. To date, Defendant has not provided Plaintiffs' counsel with any information relative to an audit. Plaintiffs agree that a case review is necessary to ensure the accuracy of newly implemented notices, particularly the Notice of Case Action, which is the primary eligibility notice sent to participants.

5. **Barriers:**

In addition to the numerous systemic barriers identified in the Compliance Specialist's report, Plaintiffs have documented the following systemic barriers which prevent

members of the Plaintiff class from timely receiving the benefits to which they are entitled.

- a. Illegal Demand for a Social Security Number (SSN) to Access Benefits: HSD's Electronic Benefit Transaction (EBT) card system illegally requires the entry of an SSN to activate the card so families can make food purchases. This prevents eligible families from receiving expedited SNAP benefits on time, violates the Decree's prohibition on illegal requests for verification and violates Orders of the Court requiring Defendant to remove illegal requests for SSNs. When the head of household does not have an SSN, the family cannot activate the card and access benefits. The activation message does not inform families that there is an alternative way to activate the card. Families have to call ISD (which is very difficult given the status of the phone system) or go into a local office and request an alternative number. The employee training Defendant shared with Plaintiffs' Counsel does not include instructions on assigning an alternative number. Plaintiffs met with Defendant to discuss this issue on multiple occasions and even provided alternative EBT card activation methods to the Department. Although Defendant promised to fix this issue over four months ago, as of the time of this filing, the problem continues to exist and HSD has yet to provide a plan or date for completion.
- b. Emergency Medical Services for Aliens (EMSA): EMSA pays emergency medical bills for non-citizens who are not eligible for full Medicaid because of their immigration status. The Department is required to make EMSA eligibility decisions within 45 of the application date. Applicants are entitled to the full



application period to prove their eligibility and must be sent individualized eligibility notices, as required by the Decree. In the course of representing clients, Plaintiffs learned that ISD management has instructed workers to enter applications into the system with an incorrect application date and to use a manual notice of eligibility that is not individualized or specific. This means that Defendant does not track the timely processing of EMSA applications, something the Compliance Specialist noted on page 13 of her report. The process is described in a worker training. This change to the application process was never provided to Plaintiffs' Counsel for comment, as required by the Decree, and is illegal.

- c. Medicaid Income Calculation: The Defendant does not comply with federal law in determining income eligibility for self-employed individuals applying for or renewing Medicaid. Income eligibility for Affordable Care Act Medicaid is based on "modified adjusted gross income" ("MAGI") used for tax filing purposes. Self-employed individuals' MAGI is supposed to be determined using gross income minus the deductions which are attributable to a trade or business carried out by the taxpayer. But, the Department provides workers with a form to calculate self-employed income to determine eligibility that only allows for deductions enumerated on the Schedule C tax form (Profit and Loss for Business), even though the deductions allowed on a Schedule C are more limited than the many deductions allowed under federal Medicaid law for self-employed individuals. The result is that some self-employed individuals are not being granted Medicaid coverage because HSD does not consider allowable deductions

that would make them income-eligible. Plaintiffs wrote to the Department about this issue in September 2016. HSD acknowledged receipt of the letter and said that the issue would be fixed. To date, Plaintiffs have yet to receive a full response and, to our knowledge, this issue has yet to be addressed.

- d. Improper SNAP Denials: The Department is required to measure and report on the number of SNAP cases that are closed or denied improperly in a given month. This is known as the Case and Procedural Error Rate (CAPER). The Compliance Specialist Report states: “The division also has a cumulative negative error rate of 1% or CAPER of 99%” (p. 6). Plaintiffs understand this number to state the goal, not the reality. HSD reports a statewide CAPER of 50.9% for the month of August 2017 and a CAPER of 46.18% for Fiscal Year 2017.<sup>5</sup> These errors are identified following a review of a statistically significant case sample of 749 cases in which eligibility was denied, terminated, or suspended. A summary of Defendant’s statewide data on CAPER is attached as Exhibit 4. The last time FNS reported this data on a national level, New Mexico’s CAPER was 51.64% - almost double the national average of 26.3%.

**B. Plaintiffs Object to the Special Master’s Erroneous Statement that Defendant’s Failure to Provide Food and Medical Assistance Does Not Causes Irreparable Harm to Members of the Plaintiff Class**

Plaintiffs strongly object to the Special Master’s finding that Defendant’s failures do not cause irreparable or immediate harm to members of the Plaintiff class. Untimely eligibility decisions cause irreparable harm and there is substantial evidence that Defendant denies benefits to eligible families, causing further harm. Data from Defendant shows that each month,

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<sup>5</sup> See FFY 2017 SNAP Performance Report-Eleventh available at [http://www.hsd.state.nm.us/uploads/files/GI%2018-07%20FFY%202017%20SNAP%20Performance%20Report-Eleventh\(1\).pdf](http://www.hsd.state.nm.us/uploads/files/GI%2018-07%20FFY%202017%20SNAP%20Performance%20Report-Eleventh(1).pdf)

thousands of SNAP renewals are overdue because of HSD fault. These families do not receive benefits the following month because of HSD's delays. Applicants who call ISD to get information about their case do not have their calls answered. Defendant's faulty training has resulted in immigrant applicants being deterred from seeking benefits and receiving incorrect notices and eligibility decisions. Plaintiffs' counsel recently represented a pregnant woman who was turned away from a local ISD office multiple times and had her application illegally denied. She went 34 weeks without prenatal care. Immigrant families who do not have a social security card cannot activate their EBT card upon receipt and do not receive information about how to activate the card in time to get Expedited SNAP benefits.

This Court found that "a SNAP beneficiary's loss of food assistance is irreparable." *See* Doc. 658 at 14. This Court has also cited to similar decisions surrounding the loss of Medicaid benefits, stating "No amount of damages would be adequate to retroactively remedy the loss of food assistance and the resulting financial and physical hardship to Plaintiffs. *See Beltran v. Myers*, 677 F.2d 1317, 1322 (9th Cir. 1982) (finding a showing of risk of irreparable injury where enforcement of California rule may deny plaintiffs needed medical care). This Court also found that the availability of food banks, shelters and other community resources does not alleviate the serious harm caused when eligible families go without food and medical assistance to which they are entitled. In fact, the Court stressed that taxing the limited resources of other programs and charities is, itself, against the public interest. *See* Doc. 685 at 22 ("When eligible individuals do not receive food assistance, it puts pressure on other entities and state programs such as food banks and shelters, and family members and friends to provide for the individuals the SNAP program is meant to assist.") Indeed, the U.S. Supreme Court found that denying welfare benefits to an eligible applicant may deprive the person "of the very means by which to

live.” *Goldberg v. Kelly*, 397 U.S. 254, 264 (1970). When a person lacks other resources, his or her situation becomes “immediately desperate.” *Id.* For this reason courts frequently have granted preliminary injunctions when state actors illegally deny benefits to eligible participants. *See, e.g., Morel v. Giuliani*, 927 F. Supp. 622, 635 (S.D.N.Y. 1995) ( regarding food stamps and cash assistance,) (the Court stated: “To indigent persons, the loss of even a portion of subsistence benefits constitutes irreparable injury.”); *Abreu v. Callahan*, 971 F. Supp. 799, 821 (S.D.N.Y. 1997) (“While welfare benefits are money or money’s equivalent, their denial almost universally has been recognized as irreparable harm because recipients depend on them not merely as a convenient medium of exchange, but to sustain life.”); *Moore v. Miller*, 579 F. Supp.1188, 1192 (N.D. Ill. 1983) (“For those living in the ‘grip of poverty,’ living on the financial edge, even a small decrease in payments can cause irreparable harm.”) There is simply no factual or legal basis for the Special Master’s erroneous findings.

### **C. Plaintiffs Object to the Special Master’s Statement About the Consent Decree Class Definition and Dismissal of Court Orders**

Plaintiffs strongly object to the statement that compliance is not attainable because there is not an end date for applicants to be included in the class action. The Decree explains that the case will be dismissed after Defendant is in compliance for a period of six consecutive months. Decree, p. 24. The class definition including “all current and future applicants” is a common class definition necessary to protect plaintiffs whose claims will become mooted prior to completion of the litigation. Closing the class would mean that claims could become moot and the case dismissed without the alleged harm being remedied for those similarly situated. One of the purposes of a class action is to eliminate the possibility of repetitious litigation – to get the violations of law remedied even if it takes a while. This is why the definition is common in cases involving administration of public benefit programs and has been consistently upheld by Courts.

*See D.G. ex. Rel. Strickland v. Devaughn*, 594 F. 3d 118 (10<sup>th</sup> Cir. 2010) (certifying a class defined as “all children who are or will be in the legal custody of [Oklahoma Department of Human Services] due to a report or suspicion of abuse or neglect or who are or will be adjudicated deprived due to abuse or neglect.”) *Leiting-Hall v. Winterer*, 2015 WL 1470459, at \*5–6 (D. Neb. Mar. 31, 2015) (certifying a class defined as “All Nebraska residents who since January 1, 2012 have applied, are applying, or will apply for initial and renewal benefits.”); *Like v. Carter*, 448 F. 2d 798, 802 (8<sup>th</sup> Cir. 1971) (certifying a class defined as “eligible St. Louis welfare recipients whose applications have not been acted upon within 30 days after filing.”); *Rovidoux v. Celani*, 987 F.2d 931 (2d Cir. 1993) (certifying a class defined as “all current and future Vermont applicants for assistance from the Food Stamp, ANFC, and Fuel Assistance Programs.”); *Reynolds v. Giuliani*, 118 F.Supp. 2d 352, 387 (S.D.N.Y.) (certifying a class defined as “all New York city residents who have sought, are seeking, or will seek to apply for food stamps, Medicaid, and/or cash assistance at Job Center.”).

Dismissal of Court Orders is not appropriate until Defendant has complied with both the Orders and the Consent Decree. Orders entered by the Court over the long period of Defendant’s non-compliance require Defendant to take actions to comply with the Decree. Until Defendant has reached full compliance with the Decree and the case is dismissed, Defendant is bound by the Decree and Orders interpreting its requirements.

**D. Plaintiffs Object to the Special Master’s Characterization of Automating Individualized Denial and Closures for Procedural Reasons**

Plaintiffs agree that Defendant should utilize automated functions in compliance with the law and Orders of the Court. Plaintiffs do not agree that Defendant should reinstate the process that was previously in place. Any transition to automating denials and closures should be programmed with significant oversight by the Special Master and communication with Plaintiffs’

Counsel. Automatic denial and closure were previously programmed by Defendant to terminate and deny benefits when a case was not processed by HSD by the due date, regardless of whether the applicant had timely supplied documentation that the household was eligible. These functions caused tens of thousands of New Mexicans to lose benefits because Defendant was not timely reviewing documents submitted by the household. As a result, tens of thousands of New Mexicans lost food and medical care. The Court ordered Defendant to stop allowing its computer system to automatically close or deny cases without an individualized eligibility review by a case worker. *See* Doc. 500, paragraph 7. Plaintiffs have worked with Defendant on an IT plan to automate individualized denials and case closures only for households that HSD verifies have not taken a required action to document their eligibility. Plaintiffs have reviewed two draft flowcharts that describe the logic of Defendant's proposed new programming and Plaintiffs believe Defendant's overall plan is a good one. Defendant has informed Plaintiffs that there are some specific changes to the plan that his staff would like to discuss in a meeting, to be held soon. Plaintiffs are concerned about Defendant's ability to implement this change in IT function in a way that does not harm eligible families. For this reason, Plaintiffs support automating only closures and denials that are occur following an individualized eligibility determination and only if applicants are provided individualized and specific reasons for the denial of benefits. The parties have discussed whether a modification of Doc. 500 would be necessary to allow Defendant to automate closures and denials. Plaintiffs believe that a modification would be necessary to allow the IT system to deny cases. This should only occur once Defendant has shown that he can lawfully deny or terminate benefits using an automated process. Plaintiffs are eager to come to an agreement on that process.

**E. Plaintiffs Object to the Special Master's Description of the Process for Plaintiffs' Monitoring**

Plaintiffs object to the Special Master's description of Plaintiff monitoring because it is incomplete and inaccurate. Plaintiffs' counsel have not extended the scope of the Consent Decree. The Court has interpreted the scope of the Decree on multiple occasions and this guides Plaintiffs' monitoring efforts. The vast majority of Plaintiffs' monitoring of HSD and the identification of Decree violations come from representing low income New Mexicans who have been denied benefits by Defendant and through review of data and other information received directly from Defendant. Plaintiffs have always promptly informed HSD of these problems. This is evident in Joint Status Reports, Plaintiffs' reports to the Court, letters to Defendant and data provided to the Special Master. Only twice have Plaintiffs received information from confidential informants that Plaintiffs took directly to the Court and to the Special Master before informing Defendant. This was because they implicated the conduct of senior ISD management. One was Defendant's practice of falsifying SNAP applications and the other was a directive to lie to applicants and deny them access to a phone interview. Both of these practices are changes in the application process about which Defendant is required to notify Plaintiffs' counsel prior to implementation. Defendant's failure to provide information to Plaintiffs' counsel prior to making changes in the application process is a consistent problem in this case.

**F. Plaintiffs Object to the Special Master's Claims Regarding HSD's Receipt of FNS Performance Bonuses**

The Special Master references periods of time when Defendant received performance bonuses from the Food and Nutrition Service and notes that neither party sought dismissal of the case at that time.

The Court has repeatedly rejected HSD's claim that the receipt of FNS performance bonuses demonstrates compliance with the Decree. The most recent full scale case review was done in

2005 and Plaintiffs filed a motion with the Court concerning all aspects of Decree compliance. (*See* Doc. 302). Rather than respond, Defendant sought to dismiss the case and was unsuccessful. Defendant's appeal was also unsuccessful, but lasted several years. At that time, Defendant argued that the Department had received performance bonuses. *See* p. 25 of Doc. 305. Nonetheless, the Court entered an Order finding that the Department had not fully implemented the requirements of the Decree. *See* Doc. 317.

In fact, receipt of FNS bonuses has never indicated Defendant's compliance. In 2008, Plaintiffs filed a second Motion to enforce compliance (*see* Doc. 379). Judge Conway granted that Motion and entered an Order requiring Defendant to cease illegal requests for Social Security Numbers (*see* Doc. 384). In 2013, Plaintiffs filed motions to enforce compliance with the Decree concerning Medicaid enrollment and renewal (Doc. 438) and the application process for immigrant families (Doc. 449). Plaintiffs subsequently filed motions concerning college student access to SNAP (Doc. 478), notices (Doc. 466) and illegal delays and denials (Doc. 479). Defendant again argued that he had been awarded performance bonuses. *See* p. 1 of Doc. 487 (citing performance bonuses in FY 2012). The Court entered multiple Orders to address Decree violations, including three that Defendant agreed to (concerning notices, immigrant eligibility and Medicaid renewals). *See* Doc. 475, 477, and 506. This shows that even Defendant agrees that he was out of compliance with the Decree and federal law despite receiving performance bonuses.

### **Conclusion**

For all the reasons stated above, Plaintiffs respectfully request that this Court adopt the Special Master's Report modified by the objections and comments above. Plaintiffs also request



that the Court enter an Order requiring Defendant to comply with the recommendations listed in Section I of this document.

Respectfully submitted,

/s/ Sovereign Hager

Sovereign Hager

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### **CERTIFICATE OF SERVICE**

I hereby certify that on February 20, 2018, I filed the foregoing pleading electronically with the United States District Court, causing the same to be electronically served on opposing counsel, Christopher Collins and Natalie Campbell at [Christopher.Collins@state.nm.us](mailto:Christopher.Collins@state.nm.us) and [Natalie.campbell@state.nm.us](mailto:Natalie.campbell@state.nm.us)

/s/ Sovereign Hager

Sovereign Hager