STATE OF NEW MEXICO COUNTY OF SOCORRO SEVENTH JUDICIAL DISTRICT COURT

JOSEPH HERRERA

STATE OF NEW MEXICO
SEVENTH JUDICIAL DISTRICT COURT
FILED

MAY 2 8 2013 70. 232

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No. D-725-CV-2013-00064

CHARLENE WEST

v.

HERRERA'S MOTION TO CONTINUE MAY 30, 2013 HEARING

Joseph Herrera respectfully requests that Court continue the May 30, 2013 hearing on his request for a Temporary Restraining Order (TRO) for the following reasons:

- 1. I am the General Manager of Socorro Electric Cooperative, Inc. As General Manager, I have long standing plans to attend the New Mexico Rural Electric Cooperative Association's (NMRECA) Annual Meeting in Ruidoso, New Mexico from May 29, 2013 through May 31, 2013.
- 2. The NMRECA Annual Meeting is attended by all General Managers and Board representatives of each member cooperative. I serve on NMRECA committees that will be meeting and my attendance is critical to the work of those committees and to Socorro Electric Cooperative, Inc.
- 3. The NMRECA Annual Meeting is also a unique opportunity to attend various presentations on issues of importance to cooperatives. Because of its importance to my position as General Manager, I am asking that the TRO hearing presently set for May 30, 2013 at 11 o'clock be reset to the week of June 3, 2013.

4. Since I am seeking a TRO against Ms. Charlene West to prevent further contacts between us, I did not contact Ms. West regarding this request to continue the hearing. This motion will be served on Ms. West via regular mail.

For the foregoing reasons, I respectfully request that the May 30, 2013 hearing be postponed until the week of June 3, 2013.

Joseph Herrera

Joseph Herrera

1300 Vista Drive

Socorro, New Mexico 87801

(575) 835-8145

I certify that a copy of the foregoing was served upon Ms. Charlene West on this 28th day of May, 2013 by regular mail to:
P.O. Box 98
9B Chambon Rd.
Lemitar, NM 87823.