

STATE OF NEW MEXICO
SEVENTH JUDICIAL DISTRICT
COUNTY OF SOCORRO

CHARLENE WEST,
CAROL PITTMAN, and
SARA ROBINSON,
Petitioners,

Case No.: D-725-CV-2012-89
Judge: Matthew G. Reynolds

v.

SOCORRO ELECTRIC COOPERATIVE, Inc., a
New Mexico Non Profit Corporation, and
Its BOARD OF TRUSTEES, COLLECTIVELY, and
JOSEPH HERRERA, in his capacity as its MANAGER,
Respondents.

MOTION FOR A NOTICE OF PRESENTMENT AND ATTORNEY'S FEES

COMES NOW, Petitioners, by and through undersigned counsel of record, and
moves this Honorable Court for a notice of presentment and an award of attorney's fees to
Petitioners, and in support thereof states:

1. At the December 12, 2012 Writ hearing, the Honorable Matthew G. Reynolds instructed Mr. Deschamps to prepare an order for the Court's ruling on Plaintiff's *Supplemental Petition for an Alternative Writ of Mandamus*.
2. Such order was drafted pursuant to the rulings made in open Court and was e-mailed to Ms. Wiggins, Counsel for Defendants, on December 27, 2012.
3. On December 31, 2012, the proposed Order was returned with noted changes.
4. Mr. Deschamps phone calls and messages to Ms. Wiggins' to discuss the matter were not returned.

5. Ms. Wiggins refuses to approve the proposed order and insists on inserting language that the Court did not use.
6. As a result of the foregoing, Petitioners have incurred additional attorney fees, which should be reimbursed by the Defendants.
7. Opposing Counsel, Lorna Wiggins, opposes the relief requested in this Motion.

WHEREFORE, Petitioner requests this Honorable Court:

1. Enter the attached order on such notice as the Court deems appropriate.
2. Grant Plaintiffs reasonable attorney's fees and costs in preparing the order and presenting said order to the Court.
3. Grant such other and further relief in the premises as is consistent with the principles of equity, law, and good conscience.

Respectfully submitted,
Deschamps & Kortemeier Law Offices, P.C.

"Electronically Filed" /s/ Lee Deschamps
Lee Deschamps / Stephen K. Kortemeier
P.O. Drawer 389, Socorro, NM 87801
575-835-2222
Attorneys for Plaintiffs

Certification: I hereby certify that I delivered a copy of the foregoing pleadings upon all parties herein or their respective counsel, this 25th day of January 25, 2013.

/s/ Shiloh M. Pallante