

STATE OF NEW MEXICO
THIRTEENTH JUDICIAL DISTRICT
COUNTY OF VALENCIA

THE SOCORRO ELECTRIC COOPERATIVE, INC.
Plaintiff,

v.

CHARLENE WEST, et al
Defendants.

Case No: D-1314-CV-2010-849
Judge: Albert J. Mitchell, Jr.

And

CHARLES WAGNER, individually and as
Class representative, etc.,

Cross Claim Plaintiff,

v.

SOCORRO ELECTRIC COOPERATIVE, INC.,
et al.,

•
Cross Claim Defendants.

**DEFENDANT'S MOTION FOR EXTENSION OF TIME TO FILE A RESPONSE TO
PLAINTIFF'S MOTION TO STAY DISCOVERY**

COMES NOW the Defendant, CHARLENE WEST, by and through the undersigned attorney, and Moves this Honorable Court for an extension of time within which file a response to Plaintiff, Socorro Electric Cooperative's, *Motion to Stay Discovery*. Defendant requests a one week extension to respond to Plaintiff's motion and in support states:

1. Plaintiff's response is due on or before February 16, 2012.
2. This is Defendant's first request for an extension of time to respond.
3. Due to Plaintiff's counsel's work load, including court appearances in Sierra County and Socorro County in New Mexico District Court, Magistrate Courts and Municipal Court, and

unexpected involvement in a criminal investigation, Plaintiff has been unable to file a response within the originally designated time frame.

4. Counsel will have sufficient time to complete the response by Thursday, February 23, 2012.

5. Opposing counsel, Darin Foster, was not contacted due to time constraints.
Opposition is presumed.

WHEREFORE Defendant CHARLENE WEST prays for an order of this Court extending the time for response to the Plaintiff's Motion to Stay Discovery until February 23, 2012.

Respectfully submitted this 16th day of February 2012.
Deschamps & Kortemeier Law Offices, P.C.

“Electronically Filed” /s/ Stephen Kortemeier_
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CERTIFICATE OF MAILING

A true and complete copy of this Response was served to the undersigned via the Court's electronic filing system as of the date of filing:

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Date: 2/16/12

/s/ Shiloh M. Pallante

