

STATE OF NEW MEXICO  
COUNTY OF SANTA FE  
FIRST JUDICIAL DISTRICT COURT

STATE OF NEW MEXICO, ex rel.,  
MARCO WHITE, MARK MITCHELL,  
and LESLIE LAKIND,

Plaintiffs,

vs.

Case No. D-101-CV-2022-00473

COUY GRIFFIN,

Defendant.

**NOTICE TO TAKE DEPOSITION**

TO: Matthew Struck

YOU ARE HEREBY NOTIFIED that Plaintiffs will take the deposition of Matthew Struck upon oral examination on July 27, 2022, commencing at 10:00 a.m. (Mountain time), via a Zoom videoconference, before a notary and certified court reporter.

YOU ARE FURTHER NOTIFIED that this deposition may be used at trial pursuant to Rule 1-032 or by stipulation of the parties.

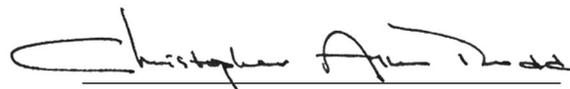
Place: Zoom Video Conference

Meeting ID Number 380 225 7737

Accessible at <https://us06web.zoom.us/j/3802257737>

Date: Wednesday, July 27, 2022

Time: 10:00 a.m. (Mountain Time)



Christopher A. Dodd  
Dodd Law Office, LLC  
20 First Plaza NW, Suite 700  
Albuquerque, NM 87102  
P: 505.475.2742  
[chris@doddnm.com](mailto:chris@doddnm.com)

Joseph Goldberg  
Freedman Boyd Hollander & Goldberg, P.A.  
20 First Plaza NW, Suite 700  
Albuquerque, NM 87102  
P: 505.842.9960, F: 505.944.8060  
[jg@fbdlaw.com](mailto:jg@fbdlaw.com)

Amber Fayerberg  
Law Office of Amber Fayerberg  
2045 Ngunguru Road  
Ngunguru, 0173, New Zealand  
P: +64 27 505 5005  
[amber@fayerberglaw.com](mailto:amber@fayerberglaw.com)

Noah Bookbinder\*  
Donald Sherman\*  
Nikhel Sus\*  
Stuart McPhail\*  
Citizens for Responsibility and Ethics in  
Washington  
1331 F Street NW, Suite 900  
Washington, DC 20004  
P: 202.408.5565  
[nbookbinder@citizensforethics.org](mailto:nbookbinder@citizensforethics.org)  
[dsherman@citizensforethics.org](mailto:dsherman@citizensforethics.org)  
[nsus@citizensforethics.org](mailto:nsus@citizensforethics.org)  
[smcphail@citizensforethics.org](mailto:smcphail@citizensforethics.org)  
*\*Pro Hac Vice*

Daniel A. Small\*  
Cohen Milstein Sellers & Toll PLLC  
1100 New York Avenue, NW  
Fifth Floor  
Washington, DC 20005  
P: 202.408.4600  
[dsmall@cohenmilstein.com](mailto:dsmall@cohenmilstein.com)  
*\* Pro hac vice*

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 5, 2022, the foregoing Notice to Take Deposition was filed through the New Mexico Odyssey File & Serve system, which caused all counsel of record to be served by electronic means. This notice was also served upon Defendant Couy Griffin by U.S. Postal First Class Mail and email at the following address:

Couy Griffin



A handwritten signature in cursive script that reads "Christopher A. Dodd".

Christopher A. Dodd  
Co-Counsel for Plaintiffs