

IN THE ELEVENTH JUDICIAL DISTRICT
STATE OF NEW MEXICO
COUNTY OF MCKINLEY

THE ZUNI PUBLIC SCHOOL DISTRICT, et al.

Plaintiffs,

THE GALLUP-MCKINLEY COUNTY SCHOOL
DISTRICT NO. 1, et al.

Plaintiffs/Intervenors,

vs.

No. D-1113-CV-98-14-II

THE STATE OF NEW MEXICO, et al.

Defendants.

**PLAINTIFF THE GALLUP-MCKINLEY COUNTY SCHOOL DISTRICT NO. 1'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS**

COMES NOW, Plaintiff THE GALLUP-MCKINLEY COUNTY SCHOOL DISTRICT NO. 1, by and through counsel, and, pursuant to Rule 1-034 NMRA requests that Defendants produce and permit the inspection and copying of the documents and other materials within thirty (30) days from the date of service hereof, at the offices of The Rosebrough Law Firm, P.C., 101 West Aztec Ave., Suite A, Gallup, New Mexico 87301.

DOCUMENTS TO BE PRODUCED:

1. All documents identifying or reflecting Public School rankings for facilities condition (NMCI, FCI or any preceding system of ranking) from 2002 to present for NM public schools.
2. All documents identifying or reflecting Facilities maintenance assessment reports (FMAR) rankings from the inception date of such assessment reports to present for each Gallup-McKinley School District school.

3. All documents identifying or reflecting Statewide Adequacy Standards adopted by the State of NM in 2002 and all amendments or changes from 2002 to present.
4. All documents identifying or reflecting Direct Legislative appropriations to NM School Districts for capital improvements made outside the PSCOC or PSFA process for each NM public school district from 2002 to present.
5. All documents, including 955F forms, which identify or reflect the percentage of bonding capacity utilized or obligated by the voters of each NM School District from 2002 to present.
6. All documents identifying or reflecting the revenues received by PSCOC from 2002 to present and the source of those revenues.
7. All documents identifying or reflecting expenditures by PSCOC for public school construction from 2002 to present for each NM public school district.
8. All documents identifying or reflecting the amount of revenues received by the State of New Mexico or school districts within the State of New Mexico for repair and maintenance of public school buildings from 2002 to present and the source of those revenues.
9. All documents identifying or reflecting requests for waivers, additional funds, emergency funds or advance funds submitted to PSCOC or PSFA for all public school projects from 2002 to present.
10. All documents identifying or reflecting PSCOC or PSFA denials of requests for waivers, additional funds, emergency funds or advance funds submitted to PSCOC or PSFA for all public school projects from 2002 to present.
11. All PSCOC or PSFA Approval of School Construction documents and response letters for all public school projects from 2002 to present.
12. All Programming Documents for public school construction throughout New Mexico from 2009 to present which identify or depict square footage, classroom size, and other amenities related to said construction.
13. All documents identifying or reflecting the numerical calculation of the state and local shares pursuant to Section 22-24-5 NMSA from 2002 to present for the public school districts of New Mexico.
14. All documents identifying or reflecting the amount of money expended by PSCOC or PSFA from 2009 to present for school construction or capital improvements for State Charter Schools with a breakdown of expenditures for each such school.

15. All documents identifying or reflecting whether public schools in New Mexico were built above adequacy or below adequacy from 2002 to present including but not limited to 100% RASD documents.

16. All documents which identify or reflect the construction of capital improvements by school districts which were funded without following the PSCOC ranking and funding process from 2002 to present.

17. All documents which identify or reflect PSCOC's and/or PSFA's most current assessment of the total amount of funds necessary to bring all New Mexico public school facilities up to existing adequacy standards.

18. All documents with indentify or reflect the total amount of funds being sought from PSCOC for funding capital improvements by all school districts and charter schools during the current funding cycle.

19. All documents identifying or reflecting the amount of funds available to PSCOC for funding capital improvements during the 2014 funding cycle.

THE ROSEBROUGH LAW FIRM, P.C.

By _____
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I hereby certify that an ORIGINAL of the foregoing was mailed to Defendants and a COPY of the foregoing was mailed to other Plaintiffs on this _____ day of July, 2015.

Robert F. Rosebrough