

Albuquerque Office
500 Marquette Ave., NW Suite 700
Albuquerque, NM 87102
(505) 242-2228 Telephone
(505) 242-1106 Facsimile
www.roblesrael.com

Santa Fe Office
130 Grant Ave., Suite 203
Santa Fe, NM 87501
(505) 242-2228 Telephone
(505) 242-1106 Facsimile
www.roblesrael.com



ROBLES | RAEL | ANAYA

Luis Robles
Marcus J. Rael Jr.
Christina E. Anaya
Douglas E. Gardner
*Charles Rennick
**David A. Roman
Taylor S. Rahn
Jordon P. George
Samuel C. DeFillippo
Julio P. Garcia
Philomena M. Hausler
Christopher W. Ryan
Robert M. White, *Of Counsel*
Randy M. Autio, *Of Counsel*
***William W. Zarr, *Of Counsel*

**Also admitted in Texas*
***Also admitted in Washington, D.C.*
****Also admitted in New York*

October 25, 2019

Jacob Maule
Legal Bureau Chief
State of New Mexico
Risk Management Division
1100 St. Francis Drive, Room 2073
Santa Fe, NM 87502
Jacob.Maule@state.nm.us

VIA EMAIL ONLY

Re: Retired Public Employees of New Mexico, Inc. v. PERA, et al.
Case No.: 1:19-cv-00891-SMV-KK
Claim No.: 2000248-000

Dear Mr. Maule:

The purpose of this letter is to provide you with a pleading in the above-referenced matter.

Enclosed, please find an Answer to Complaint for Damages from Violations of the United States Constitution, 42 U.S.C. § 1983, the New Mexico Constitution, and New Mexico Common Law [Doc. 22] filed October 25, 2019.

Thank you for your time and attention to this matter. Should you have any questions or concerns, please contact me.

Sincerely,

Douglas Gardner

DEG/jz
cc: Misty Schoeppner, Deputy General Counsel
Susan Pittard
Wayne Propst