

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW MEXICO**

PUEBLO OF SAN FELIPE, a federally  
recognized Indian tribe,

*Plaintiff,*

v.

No. 1:23-cv-296-JB-LF

DEBRA HAALAND, Secretary of the Interior, *et al.*,

*Defendants,*

PUEBLO OF SANTA ANA,

*Intervenor-Defendant.*

**PLAINTIFF’S MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT**

Pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, Plaintiff Pueblo of San Felipe (“San Felipe”) respectfully requests leave of this Court to file their First Amended Complaint. Plaintiff moves to amend their original Complaint, filed on April 5, 2023: to clarify the factual bases for relief; to add additional bases for relief including the Fifth Amendment of the United States Constitution; to amend the existing claims for relief; to amend the relief sought.

In accordance with Local Rule 15.1, a copy of Plaintiff’s proposed First Amended Complaint is attached hereto. This Motion is supported by the accompanying Memorandum.

Respectfully submitted this 29th day of July, 2024.

/s/ Rebecca L. Kidder

Rebecca L. Kidder (D.N.M. Bar No. 23-93)  
DRAGONFLY LAW GROUP, P.C.  
731 St. Joseph Street, Suite 230  
Rapid City, South Dakota, 57701  
Telephone: (605) 484-2761

Email: rebeccak@dflylaw.com

Michael A. Robinson (D.N.M. Bar No. 21-10)  
Tim Hennessy (D.N.M. Bar No. 23-84)  
Steven J. Bloxham (D.N.M. Bar No. 23-87)  
PEEBLES BERGIN SCHULTE & ROBINSON  
LLP  
2020 L Street, Suite 250  
Sacramento, California 95811  
Telephone: (916) 441-2700  
Email: mrobinson@ndnlaw.com  
thennessy@ndnlaw.com  
sbloxham@ndnlaw.com

Timothy J. Humphrey, Sr. (D.N.M Bar No. 23-108)  
Annette T. Brown (D.N.M. Bar No. 23-106)  
STETSON LAW OFFICES, P.C.  
1305 Rio Grande Blvd., N.W.  
Albuquerque, New Mexico 87104  
Telephone: (505) 256-4911  
Email: tjh@stetsonlaw.com  
atb@stetsonlaw.com

*Attorneys for Plaintiff Pueblo of San Felipe*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 29, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the ECF registrants in this case.

/s/ Rebecca L. Kidder