

SUMMONS COMPLAINT FOR WRONGFUL DEATH	
First Judicial District Court County of Santa Fe 225 Montezuma Ave. Santa Fe, NM 87501 Phone: 505.455.8250	Case Number: D-101-CV-2020-01781 Judge: Honorable Kathleen McGarry
TODD LOPEZ, As Personal Representative of the ESTATE OF DOROTHY M. DUGGINS, <p style="text-align: center;">Plaintiff,</p> LIFE CARE CENTERS OF AMERICA, INC. LIFE CARE CENTER OF FARMINGTON, PHILLIP NICKSE, in his Individual and Official Capacities, <p style="text-align: center;">Defendants.</p>	TO: Life Care Center of Farmington 1101 W. Murrary Drive Farmington, New Mexico 87401

TO THE ABOVE NAMED DEFENDANT(S): Take notice that:

1. A lawsuit has been filed against you. A copy of the lawsuit is attached. The Court issued this Summons.
2. You must respond to this lawsuit in writing. You must file your written response with the Court no later than thirty (30) days from the date you are served with this Summons. (The date you are considered served with the Summons is determined by Rule 1-004 NMRA) The Court's address is listed above.
3. You must file (in person or by mail) your written response with the Court. When you file your response, you must give or mail a copy to the person who signed the lawsuit.
4. If you do not respond in writing, the Court may enter judgment against you as requested in the lawsuit.
5. A Jury Trial has already been requested and you are also being serviced with the **Jury Demand and Plaintiff's First Discovery Instrument no later than forty-five (45) days from the date**

you are served with this Summons.

6. If you need an interpreter, you must ask for one in writing.
7. You may wish to consult a lawyer. You may contact the State Bar of New Mexico for help finding a lawyer at www.nmbar.org; 1-800-876-6227; or 1-505-797-6066.

Dated at Santa Fe, New Mexico, this **14th** day of **August**, 20**20**.

KATHLEEN VIGIL
CLERK OF DISTRICT COURT

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By: _____



/s/ Joshua K. Conaway

Joshua K. Conaway
3301 San Mateo Boulevard
Albuquerque, New Mexico 87110
Telephone: 505.243.6045
Facsimile: 505.243.6642
jconaway@fchclaw.com

and

Nichole Henry
WHITENER LAW FIRM PA
4110 Cutler Avenue NE
Albuquerque, New Mexico 87110-3896
Telephone: 505.242.3333
Fax: 505.242.3322
nichole@whitenerlaw.com

ATTORNEYS FOR PLAINTIFFS

THIS SUMMONS IS ISSUED PURSUANT TO RULE 1-004 NMRA OF THE NEW MEXICO RULES OF CIVIL PROCEDURE FOR DISTRICT COURTS.

Subscribed and sworn to before me this _____ day of _____, _____.²

Judge, notary or other officer
authorized to administer oaths

Official title

USE NOTE

1. Unless otherwise ordered by the court, this return is not to be filed with the court prior to service of the summons and complaint on the defendant.

2. If service is made by the sheriff or a deputy sheriff of a New Mexico county, the signature of the sheriff or deputy sheriff need not be notarized.

US POSTAGE

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FIRST-CLASS MAIL

\$009.00

09/15/2020 ZIP 87110
043M/30210704



Fadduol, Cluff, Hardy & Conaway, P.C.
3301 San Mateo Blvd. NE
Albuquerque, NM 87110

Life Care Center of Farmington
1101 W. Murray Drive
Farmington, New Mexico 87401

7029 2970 0000 0095 8739



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