

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO

Abigale Knowlton, et al. v. Kari Armijo

No. 1:88-cv-00385-KG-JHR (D.N.M. Feb. 13, 2026) · No. 1:88-cv-00385-KG-JHR · Decided February 13, 2026

SUMMARY

The United States District Court for the District of New Mexico reviews Plaintiffs’ objections to a Special Master’s case review report in a long-running class action concerning New Mexico’s administration of SNAP and Medicaid benefits. The Court overrules most objections, sustains the objection in part by imposing a deadline for concluding the case, adopts the Special Master’s report in all other respects, and directs the parties to meet and confer on specified remedial and compliance issues.

CASE DETAILS

COURT	United States District Court for the District of New Mexico
WRITING FOR THE COURT	Kenneth J. Gonzales
JURISDICTION	United States District Court for the District of New Mexico
DECIDED	February 13, 2026
DOCKET	1:88-cv-00385-KG-JHR
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiffs objected to a Special Master's case review report in a long-running class action concerning New Mexico's administration of federal SNAP and Medicaid benefits. The district court reviewed the objections de novo under Federal Rule of Civil Procedure 53(f).
STANDARD OF REVIEW	Under Federal Rule of Civil Procedure 53(f), factual findings made or recommended by a master are reviewed de novo. Procedural rulings are reviewed for abuse of discretion unless the appointing order provides a different standard. Objections must be specific and clearly identify a factual or legal error; general objections are insufficient.
PRECEDENTIAL VALUE	Unknown; district court amended memorandum opinion and order with no reported citation.
PARTIES	Abigale Knowlton, et al., Plaintiff class v. Kari Armijo, Secretary of the New Mexico Health Care Authority

TOPICS

civil procedure

administrative law

federal spending

health law

federalism

PRACTICE AREAS

civil procedure

administrative law

health law

federalism

federal spending

QUESTIONS PRESENTED

1. Whether plaintiffs' objections to the Special Master's findings and recommendations satisfied Federal Rule of Civil Procedure 53(f)'s requirement that objections specifically identify factual or legal error.
2. Whether the court should reject or modify the Special Master's recommendations concerning document receipts, notice errors, corrective action plans, systemic compliance measures, and evaluation of the consent decree.
3. Whether the proceedings should include clear deadlines for remedial actions and closure of the long-running consent-decree litigation.

HOLDINGS

1. Objections to a Special Master's report must be specific and clearly identify a factual or legal error; generalized or conclusory objections do not satisfy Federal Rule of Civil Procedure 53(f).
2. The court adopted the Special Master's report and overruled plaintiffs' objections concerning the challenged case-review findings, notice-error remedies, systemic compliance measures, and evaluation of the consent decree.
3. The court imposed a deadline requiring the case to be concluded no later than December 31, 2026, while declining to impose plaintiffs' proposed unspecified shorter deadlines.

KEY QUOTATIONS

“Under Federal Rule of Civil Procedure 53(f), the Court “reviews de novo all objections to findings of fact made or recommended by a master.”” (II)

““[A]s to the master’s rulings on procedural matters, Rule 53(f)(5) provides that unless the appointing order establishes a different standard, the court is to review them for abuse of discretion.”” (II)

““[F]or a court to sustain a party’s objection to the master’s report, the objection must be specific and clearly identify a factual or legal error in the report and recommendation”—“general objections” do not “satisfy this requirement.”” (II)

““[F]ederal consent decrees are” designed to be “temporary solutions that may be kept in place only as long as necessary to cure an unlawful condition”; they do not justify never-ending litigation and federal oversight of state agencies.” (III)

“Indeed, endless consent decrees “raise[] serious federalism concerns,” as they “necessarily interject[] a federal court into local affairs,” “bind[] local governmental officials who were not parties to the consent decree,” and “effectively limit[] the democratic process.”” (III)

FACTUAL BACKGROUND

The case is a long-running class action challenging New Mexico's administration of federal SNAP and Medicaid programs, including delays in eligibility determinations and benefits. The parties entered into an operative consent decree in 2018, and a Special Master was appointed to administer it and oversee case-file review procedures. Plaintiffs challenged findings and recommendations concerning document receipts, notice errors, corrective action plans, systemic compliance measures, evaluation of the decree, and deadlines for remedial actions.

PROCEDURAL HISTORY

The action was filed in 1988 and resulted in an operative consent decree approved in 2018. A Special Master was appointed to administer the decree and recommend case-file review procedures. Plaintiffs objected to the Special Master's report; the court overruled most objections, sustained the objection in part by imposing a deadline for closing the case, and adopted the report in all other respects.

DISPOSITION

other

REMAND INSTRUCTIONS

The parties must meet and confer regarding the second and third objections and present their positions to the Special Master within 30 days. The Special Master must then rule promptly. The parties must work with the Special Master toward more detailed, data-supported recommendations and conclude the case no later than December 31, 2026.

CASES CITED

- Knowlton v. Armijo, 2024 WL 4615849, at *1–2 (10th Cir.)
- Mitchell v. City of Moore, 218 F.3d 1190, 1199 (10th Cir. 2000)
- Hatten-Gonzales v. Scrase, 2022 WL 655910, at *1 (D.N.M.)
- Jackson v. Los Lunas Community Program, 880 F.3d 1176, 1192, 1196, 1199 (10th Cir. 2018)

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO
ABIGALE KNOWLTON, et al., Plaintiffs, v. No. 1:88-cv-00385-KG-JHR KARI ARMIJO,
Secretary of the New Mexico Health Care Authority, Defendant. AMENDED MEMORANDUM
OPINION AND ORDER This matter is before the Court on Plaintiffs' objections to the Special
Master's case review report. Doc. 1200. Defendant did not object to the Special Master's report or
respond to Plaintiffs' objections; any objections not raised are waived.

Doc. 762 at 3 ("Failure to timely object to the Special Master's findings will constitute a waiver of
those objections."). After reviewing the Special Master's report de novo, the Court overrules in

part and sustains in part Plaintiffs' objections. See Fed. R. Civ. P. 53(f).

I. Background This is a "long-running class action lawsuit" filed in 1988 with a "complex procedural history" challenging New Mexico's "administration of federal social benefits programs." *Knowlton v. Armijo*, 2024 WL 4615849, at *1 (10th Cir.).

The class includes "[a]ll present and future applicants" to the federal SNAP or Medicaid program "who have not or will not receive an eligibility determination or benefits under these programs from [the New Mexico Human Services Department] within the time limits imposed by law." *Id.* "The parties entered and [this Court] approved the operative consent decree—the Second Revised Modified Settlement Agreement and Order—in 2018." *Id.* (footnote omitted).

The Special Master was "appointed to administer the [consent] decree" and "recommend[] case file review procedures," such as the case review at issue here. *Id.* at *2. II. Standard of Review Under Federal Rule of Civil Procedure 53(f), the Court "reviews de novo all objections to findings of fact made or recommended by a master." *Wright & Miller*, Fed. Practice & Proc. § 2612 (2025) ("Wright & Miller"). "[A]s to the master's rulings on procedural matters, Rule 53(f)(5) provides that unless the appointing order establishes a different standard, the court is to review them for abuse of discretion." *Id.* "[F]or a court to sustain a party's objection to the master's report, the objection must be specific and clearly identify a factual or legal error in the report and recommendation"—"general objections" do not "satisfy this requirement." *Id.* III.

Analysis First Objection. Plaintiffs first "object to the Special Master's reversal of" unspecified "error findings" in Plaintiffs' case review that "Defendant had systematically failed to create and retain receipts for documents submitted by class members," findings to which Defendants allegedly "agreed." Doc. 1200 at 3.

The Court overrules this objection. Plaintiffs do not identify, with record citations or any other indicators, the specific "error findings" to which they refer; nor they do cite evidence of Defendant's agreement with their error findings.

The Court is "not obligated," and declines in this case, "to comb the record in order to make [Plaintiffs] arguments for [them]." *Mitchell v. City of Moore*, 218 F.3d 1190, 1199 (10th Cir. 2000). Again, "general objections" do not satisfy Rule 53(f)'s requirements. *Wright & Miller* § 2612.

Second Objection. Plaintiffs next contend that the Special Master "did not fully address the largest sources of notice errors" for Question 15. Doc. 1200 at 3–4. They "request that a corrective action plan address the most common errors found in Notices and specifically address the lack of calculation tables" found in 10 of 64 cases. *Id.* at 4. Plaintiffs also ask that "Recommendation 2" in the Special Master's report "be applied to require review and correction of both the ["Help Us

Make a Decision” request (‘HUMAD’)] and the ISD 201 for elderly and disabled New Mexicans receiving nursing home level of care.” Id. at 4.

The Court rejects these conclusory requests as well and overrules Plaintiffs’ second objection, as “Plaintiffs came forth with no explanation or argument, that is, no specific objection, as to why the Special Master’s [findings are] insufficient to address the problem[s]” at hand. *Hatten-Gonzales v. Scrase*, 2022 WL 655910, at *1 (D.N.M.). Plaintiffs, for example, assert that the HUMAD is “unintelligible” and “flawed” because it is “not programed to seek the types of documents that the agency needs for this group of class members,” but Plaintiffs offer no further explanation or evidence from the record to substantiate these assertions.

Doc. 1200 at 4. The Court will not overturn the Special Master’s findings based on these generalized objections; nor will the Court make Plaintiffs’ arguments for them. See *Wright & Miller* § 2612. The parties are ordered to meet and confer about these issues and present their positions to the Special Master within 30 days of this order; the Special Master shall then rule on these issues promptly.

Third Objection. Plaintiffs also contend that the Special Master’s recommendations “did not include systemic remedies to permanently address the continued high rate of eligibility and notice errors.” Doc. 1200 at 4–7. They ask that a corrective action plan “implement an internal compliance system” for Defendant and that the Court “order Defendant to implement a worker manual that will be a comprehensive source of application and renewal processing guidance for workers.” Id. The Court, likewise, overrules these objections.

Again, Plaintiffs cite no record evidence to support their argument that the alleged lack of an internal compliance system or worker manual contributed to the “high level of eligibility errors this year” or that the specific system and manual that they propose will reduce such errors going forward.

The Court declines to overturn the Special Master’s findings and impose generalized, broadly worded directives based solely on Plaintiffs’ conjecture. “Plaintiffs believe the Special Master strongly endorses” their request that the Court “order Defendant to create...an enduring internal review system,” but the Court does not find any evidence of this endorsement in the Special Master’s report or the record.

Doc. 1200 at 6. Nor do Plaintiffs cite any such evidence. The Court directs the parties to work together with the Special Master on these issues to create a more detailed recommendation to present to the Court that relies on data and record evidence—not speculation. Specifically, the parties are ordered to meet and confer about these issues and present their positions to the Special Master within 30 days of this order; the Special Master shall then rule on these issues promptly.

Fourth Objection. Next, Plaintiffs argue that the Court should reject the Special Master's fifth recommendation that the parties "[c]omplete an evaluation of the Consent Decree to give recognition to the requirements that have been satisfied and give consideration to the compliance measure for Section III of the Consent Decree and make recommendations to the Special Master and the Court." Doc.

1198 at 19. Plaintiffs argue that this recommendation is "premature" because Defendant "has not satisfied the Decree's current requirements," the "Decree does not provide alternative compliance measures," and "Plaintiffs do not think a modification of the Decree is at all justified at this time." Doc. 1200 at 7.

The Court overrules these objections as well. Recommendation five does not ask Plaintiffs to excuse noncompliance with the current consent decree; it asks the parties to come together to analyze the consent decree going forward for efficiencies and potential ways to streamline this nearly 40-year-old lawsuit.

The Court agrees with this recommendation. Fifth Objection. Last, Plaintiffs argue that, while the Special Master "require[d] Defendant to act or confer with Plaintiffs' Counsel on a remedy," the Special Master's recommendations "do not require any deadlines for doing so." Doc. 1200 at 7. Plaintiffs therefore propose that "all negotiated remedial actions be satisfactorily concluded by January 1, 2027, with shorter time frames for the items that have the most impact on participants." *Id.* The Court overrules in part and sustains in part this objection.

While January 1, 2027, may or may not be a reasonable deadline for certain remedial actions, the Court declines to fashion, on its own without input from the parties or Special Master, "shorter time frames for the [unspecified] items" that Plaintiffs contend allegedly "have the most impact on participants." *Id.* Plaintiffs' suggestions are, again, too vague to adopt, and they violate Rule 53(f)'s requirement that objections "must be specific and clearly identify a factual or legal error" in the Special Master's report.

Id. That said, the Court agrees with Plaintiffs that, as a general matter, clear and achievable deadlines should be imposed in these proceedings. The Court takes this opportunity to express a level of disappointment that the parties have not made more significant progress toward closing this lawsuit. "[F]ederal consent decrees are" designed to be "temporary solutions that may be kept in place only as long as necessary to cure an unlawful condition"; they do not justify never-ending litigation and federal oversight of state agencies.

Jackson v. Los Lunas Cmty. Program, 880 F.3d 1176, 1192 (10th Cir. 2018) (emphasis added). Indeed, endless consent decrees "raise[] serious federalism concerns," as they "necessarily interject[] a federal court into local affairs," "bind[] local governmental officials who were not parties to the consent decree," and "effectively limit[] the democratic process." *Id.* at 1196, 1199.

The Court therefore admonishes the parties to work together with the Special Master to streamline this case and find creative and effective ways to ensure both that the State accurately administers the SNAP and Medicaid programs in New Mexico and that the end is in sight for this nearly 40-year-old lawsuit. Indeed, the Court orders that this case be concluded no later than December 31, 2026.

IV. Conclusion Plaintiffs' objections to the Special Master's report (Doc. 1200) are overruled in part and sustained in part. The objections are sustained in part in that the Court imposes the deadline for closing this case described above.

The objections are overruled, and the Special Master's report is adopted, in all other respects. IT IS SO ORDERED. /s/Kenneth J. Gonzales_____ CHIEF UNITED STATES DISTRICT JUDGE • Please note that this document has been electronically filed.

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