

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)