

**STATE OF NEW MEXICO  
COUNTY OF BERNALILLO  
SECOND JUDICIAL DISTRICT COURT**

**IN THE MATTER OF THE ESTATE OF KEISHA ATKINS.**

**NO.** \_\_\_\_\_

**PETITIONER TINA ATKINS APPLICATION FOR APPOINTMENT OF PERSONAL  
REPRESENTATIVE IN WRONGFUL DEATH ACTION**

COMES NOW, Petitioner Tina Atkins, by and through her attorney, Michael J. Seibel, and hereby petition this Court to appoint Petitioner as personal representative of the Estate of Keisha Marie Atkins in this action, and as grounds therefore states:

1. Keisha Marie Atkins was the victim of possible medical negligence occurring at the offices of Curtis Boyd M.D. P.C. located at 522 Lomas Blvd NE Albuquerque, NM 87102.
2. Ms. Atkins died on February 4, 2017, at the age of 23 years old.
3. Tina Atkins, age 56 years old, is the mother of Keisha Marie Atkins and sole heir entitled to be the wrongful death representative.
4. At death, decedent was domiciled in Albuquerque, Bernalillo County, New Mexico.
5. Tina Atkins seeks be appointed personal representative, under NMSA 1978 §41-2-3, in order to investigate the circumstances surrounding the medical negligence, and pursue an action for wrongful death, and pursue a medical board complaint if necessary.
6. No personal representative of the decedent has been appointed in New Mexico or elsewhere.
6. The personal representative's duties and authority shall include but not limited to filing and managing medical board complaint, retrieval of records, and subpoenas of

documents, of the Estate of Keisha Marie Atkins, and the making of filing of any claims related to her untimely death occurring on or about February 4, 2017.

7. The personal representative should not be liable for any decisions made or acts undertaken in his role as personal representative.
8. Tina Atkins, by her signature hereto, consents to being appointed as personal representative in this matter, and affirms that the statements contained in the application are true to the best of his knowledge and belief.
9. There is no opposing party or opposing counsel for concurrence in this matter.

**WHEREFORE**, Petitioner prays that she be informally appointed as a personal representative concerning an action for wrongful death, without bond, and for such other and further relief as may be proper.

Respectfully ,

MICHAEL J. SEIBEL & ASSOCIATES

/s/Michael J. Seibel

Michael J. Seibel  
8500 Menaul N.E. Suite A-410  
P.O. Box 14066  
Albuquerque, NM 87191-4066  
(505) 275-1700; FAX (505) 275-1705

Approved:

Tina P. Atkins

Tina Atkins  
c/o Michael J. Seibel  
8500 Menaul N.E. Suite A-410  
P.O. Box 14066  
Albuquerque, NM 87191-4066  
(505) 275-1700; FAX (505) 275-1705