

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)	
and)	
STATE OF NEW MEXICO, <i>ex rel.</i> STATE)	
ENGINEER,)	
)	
Plaintiffs,)	
)	No. 01cv00072 BB
and)	
)	ZUNI RIVER BASIN
ZUNI INDIAN TRIBE, NAVAJO NATION,)	ADJUDICATION
)	
Plaintiffs in Intervention,)	
)	
v.)	
)	
A&R PRODUCTIONS, et al.)	
)	
Defendants.)	
_____)	

MOTION TO JOIN ADDITIONAL PARTIES DEFENDANT

The United States of America (“United States”) hereby respectfully requests the Court to join as additional parties the persons or entities named below and order them to answer the United States’ Complaint in this action as required in any civil action in the United States District Court or suffer default judgment against them. In support of this motion, the United States asserts:

1. The persons or entities listed below are diverting and using or may claim a right to divert and use surface or underground waters within the Zuni River stream system in New Mexico:

Subfile	Defendant
ZRB-5-0001	WILLIAM E. ANDERSEN P.O. BOX 486 RAMAH, NM 87321
ZRB-5-0002	ANTHON ANDERSON FAMILY TRUST 4120 W LANGSTROTH DR. RIO RANCHO, NM 87124
ZRB-5-0005	DENNIS BOND P.O. BOX 845 RAMAH, NM 87321
ZRB-5-0013	CAMPBELL REVOCABLE TRUST P.O. BOX 890 RAMAH, NM 87321
ZRB-5-0014	THE CLAWSON FARM & RANCH LLC D/B/A THE QUARTER CIRCLE RANCH P.O. BOX 453 RAMAH, NM 87321
ZRB-5-0017	LINDA LEE CLAWSON P.O. BOX 163 RAMAH, NM 87321
ZRB-5-0019	OLIN CLAWSON P.O. BOX 381 RAMAH, NM 87321
ZRB-5-0019	JACKI CLAWSON P.O. BOX 381 RAMAH, NM 87321
ZRB-5-0024	CARLETT DANIELS P.O. BOX 524 RAMAH, NM 87321
ZRB-5-0024	KELSEY DANIELS P.O. BOX 524 RAMAH, NM 87321

Subfile	Defendant
ZRB-5-0027	PAUL J. ENZ P.O. BOX 876 RAMAH, NM 87321
ZRB-5-0027	CAROLYN F. ENZ P.O. BOX 876 RAMAH, NM 87321
ZRB-5-0028	SELINA C. EVANS P.O. BOX 208 RAMAH, NM 87321
ZRB-5-0029	GENTRY CONSTRUCTION CO., INC. 402 ELK SUMMIT DR. TODD, NC 28684
ZRB-5-0030	JONATHAN GOLDRICK P.O. BOX 185 RAMAH, NM 87321
ZRB-5-0030	MASAE GOLDRICK P.O. BOX 185 RAMAH, NM 87321
ZRB-5-0031	JIM Y. GREENE P.O. BOX 458 MOUNTAINAIR, NM 87036
ZRB-5-0031	DOROTHY R. GREENE P.O. BOX 458 MOUNTAINAIR, NM 87036
ZRB-5-0032	KENNETH & ROSEMARY HARRINGTON REV. TRUST P.O. BOX 266 RAMAH, NM 87321
ZRB-5-0034	ROBERT W. IONTA & LINDA A. IONTA REV TRUST P.O. BOX 1059 GALLUP, NM 87305

Subfile	Defendant
ZRB-5-0036	IRVIN L. JONES P.O. BOX 782 RAMAH, NM 87321
ZRB-5-0036	LOIS M. JONES P.O. BOX 782 RAMAH, NM 87321
ZRB-5-0041	LURLENE LEWIS P.O. BOX 237 RAMAH, NM 87321
ZRB-5-0049	BRIAN P. MAKI P.O. BOX 621 RAMAH, NM 87321
ZRB-5-0049	MARYAH L. MAKI P.O. BOX 621 RAMAH, NM 87321
ZRB-5-0059	LARRY J. REEVES P.O. BOX 575 RAMAH, NM 87321
ZRB-5-0059	SUZANNE M. REEVES P.O. BOX 575 RAMAH, NM 87321
ZRB-5-0062	GARY L. TIETJEN & GERALDINE B. TIETJEN TRUST 110200 CORONADO NE ALBUQUERQUE, NM 87122

The water uses, or claims to the right to use water, of these persons or entities are subject to the laws of the State of New Mexico and the United States. This Court has exclusive jurisdiction to adjudicate all claims to the right to divert, store, or use public waters of the Zuni River stream system in New Mexico.

2. The persons or entities listed above have been identified by the Hydrographic Survey for Sub-area Ramah of the Zuni River stream system and may be diverting and using water associated with the subfile numbers listed, or may otherwise be using or diverting surface or underground waters within the Zuni River stream system.

3. For the benefit of other parties, and by way of explanation, the United States asserts that motions to add additional defendants, dismiss defendants, correct defendants' names, and take other corrective action, are parts of an on-going process made necessary by the hydrographic survey, defendants' responses, and other kinds of new information received during the course of this adjudication. The United States advances such motions primarily for the purpose of ensuring that the Court's records indicate as accurately as possible the persons or entities that are parties to this case.

DATED: April 2, 2007

Electronically Filed

/s/Bradley S. Bridgewater

BRADLEY S. BRIDGEWATER
U.S. Department of Justice
1961 Stout Street – 8th Floor
Denver, CO 80294
(303) 844-1359

COUNSEL FOR THE UNITED STATES

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on April 2, 2007, I filed the foregoing *Motion To Join Additional Parties Defendant* electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Edward C Bagley

lula.valdez@state.nm.us,edward.bagley@state.nm.us,connie.flint@state.nm.us,
arianne.singer@state.nm.us,marjorie.dryden@state.nm.us,
fred.kipnes@state.nm.us,vina.gallegos@state.nm.us

Bidtah Becker

bidtahnbecker@navajo.org

James C. Brockmann

jcbrockmann@newmexicowaterlaw.com

Christina J Bruff

cjb@lrpa-usa.com

Kenneth J. Cassutt

kencass@chflaw.com

William J. Cooksey

wcooksey@dcbf.net

Jeffrey A. Dahl

dahljeffrey@comcast.net,rlddms@aol.com

Charles T. DuMars

ctd@lrpa-usa.com

Vickie L. Gabin

vlgabin@earthlink.net,kbruner@hubwest.com,nef_cmecf@mac.com

David W Gehlert

david.gehlert@usdoj.gov,judy.tetreault@usdoj.gov,lori.montano@usdoj.gov

James E. Haas

lchlaw@lchlaw.com

Raymond Hamilton

raymond.hamilton@usdoj.gov,USANM.ECFCivil@usdoj.gov,
Rosemarie.Garcia@usdoj.gov

Stephen G. Hughes

shughes@slo.state.nm.us

Robert A. Johnson

rjohnson@jn-law.com,cmuggaberg@jn-law.com,sbrowsersock@jn-law.com

Susan C Kery

sck@ssslawfirm.com,djs@ssslawfirm.com

Jane Marx

janemarx@earthlink.net,skarpp@janovcooneylaw.com

Stephen R. Nelson

snelson@jn-law.com,cmuggaberg@jn-law.com,sbrowsersock@jn-law.com

Tanya L. Scott

tls@lrpa-usa.com

Peter B. Shoenfeld

petershoenfeld@qwest.net

William G. Stripp

stripp@wildblue.net

John W. Utton

jwu@ssslawfirm.com,djs@ssslawfirm.com