

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

UNITED STATES OF AMERICA and)	
STATE OF NEW MEXICO, ex rel. STATE)	
ENGINEER,)	
Plaintiffs,)	
)	
and)	No. 01cv0072 BB/WDS
ZUNI INDIAN TRIBE and NAVAJO NATION,)	
Plaintiffs-in-Intervention)	
)	
)	ZUNI RIVER BASIN
v.)	ADJUDICATION
)	
A & R PRODUCTIONS, et al.,)	Subfile No. ZRB-1-0100

UNOPPOSED JOINT MOTION TO EXTEND TIME WITHIN WHICH TO FILE RESPONSES
TO DEFENDANT JOANN STRICKLAND, TRUSTEE FOR THE JOANN STRICKLAND
TRUST’S OBJECTIONS TO SPECIAL MASTER’S REPORT ON MOTION TO SET ASIDE
DEFAULT JUDGMENT REGARDING SUBFILE NO. ZRB-1-0100

Come Now, the State of New Mexico *ex rel.* State Engineer (“State”) and the United States, by and through their respective undersigned counsel, and hereby move for an extension of the time within which to file responses to *Objections to Special Master’s Report on Motion to Set Aside Default Judgment* (Doc. No. 2490) (“*Objections*”). In support thereof, the Parties state as follows:

1. On December 10, 2009, Defendant Joann Strickland, Trustee for the Joann Strickland Trust (“Defendant”), filed her *Objections*. Attached as an exhibit to the *Objections* is Defendant’s affidavit, presenting new evidence in support of Defendant’s claims.
2. Both the State and the United States would like an opportunity to respond to Defendant’s *Objections*, and to address the new evidence presented.
3. On December 10, 2009, attorney Bradley S. Bridgewater, counsel for the United States, was called away on a family emergency.

4. Edward Bagley, counsel for the State, has only just returned from a family emergency.

5. Additionally, the upcoming holiday season will likely impact everyone's schedules.

6. For these reasons, the State and the United States request an extension of time to respond to Defendant's *Objections* until January 15, 2010, and for Defendant to file a reply to the responses to January 29, 2010.

7. Tanya Scott, counsel for Defendant, has been contacted, and does not oppose this Motion.

WHEREFORE, the State and the United States jointly request that the date by which any responses must be filed to the Defendant's *Objections* be extended to January 15, 2010, and the date by which Defendant's replies must be filed be extended to January 29, 2010.

Electronically Filed

/s/ Edward C. Bagley

Edward C. Bagley
Special Assistant Attorney General
Attorneys for State of New Mexico
P.O. Box 25102
Santa Fe, NM 87504-5102
Telephone: (505) 827-6150

(approved telephonically)
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 December 11, 2009, I filed the foregoing electronically through the CM/ECF system, which caused the parties or counsel reflected on the Notice of Electronic Filing to be served by electronic means.

