

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 MV/WPL
ZUNI INDIAN TRIBE and NAVAJO NATION,	)	
Plaintiffs-in-Intervention	)	
	)	
	)	ZUNI RIVER BASIN
v.	)	ADJUDICATION
	)	
A & R PRODUCTIONS, et al.,	)	Subfile No. ZRB-2-0098

**JOINT UNOPPOSED MOTION FOR EXTENSION OF TIME FOR PLAINTIFFS TO RESPOND TO DEFENDANTS’ OBJECTIONS REGARDING SUBFILE ZRB-2-0098**

NOW COME the State of New Mexico *ex rel.* State Engineer and the United States of America, and hereby jointly request an extension of ten (10) days to respond to Defendants JAY Land Ltd. Co. and Yates Ranch Property LLP’s (“JAY”) March 21, 2016 *Objections to the Proposed Findings and Recommended Disposition of the Magistrate (“Objections”)* (No. 3230), and in support thereof, state as follows:

1. On March 7, 2016 the Magistrate Judge entered his *Proposed Findings and Recommended Disposition (“Proposed Findings”)* (No. 3223), recommending summary judgment be granted the United States on JAY’s water right claims under subfile ZRB-2-0098.
2. On March 21, 2016, JAY filed its *Objections* to the Magistrate Judge’s *Proposed Findings*.

3. Counsel for the United States is out of the office this week, and will not be back in the office to work on a response brief until the week of April 4, 2016.

4. A ten (10) day extension will allow the Plaintiffs sufficient time to develop a single response or coordinated responses, thereby conserving judicial resources.

5. An extension of this briefing schedule will not interfere with established case management deadlines.

6. Counsel for JAY has been contacted, and does not oppose this motion.

**WHEREFORE**, the State of New Mexico *ex rel.* State Engineer and the United States of America jointly request an extension of time of ten (10) days for the Plaintiffs to file their response or responses to Defendant JAY's *Objections to the Proposed Findings and Recommended Disposition of the Magistrate*.

Electronically Filed

/s/ Edward C. Bagley

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

COUNSEL FOR THE UNITED STATES

*Approved electronically*

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ANDREW "GUSS" GUARINO  
U.S. Department of Justice  
South Terrace, Suite 370  
999 18<sup>th</sup> Street  
Denver, CO 80202  
Telephone: (303) 844-1343

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on March 30, 2016, 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.