

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-ACE
and	)	
	)	ZUNI RIVER BASIN
ZUNI INDIAN TRIBE, NAVAJO NATION,	)	ADJUDICATION
	)	
Plaintiffs in Intervention,	)	Sub-areas 4 & 8
	)	
v.	)	Subfile ZRB-1-0087
	)	
A&R PRODUCTIONS, et al.	)	
	)	
Defendants.	)	
_____	)	

**MOTION TO EXTEND CONSULTATION PERIOD AND ANSWER DATE**

The United States of America (“United States”) hereby moves the Special Master to allow additional time for consultations with representatives of the Defendant Estate of Catherine Reinschmidt in Subfile ZRB-1-0087 by extending the Defendant’s deadline for filing a form Subfile *Answer* by 45 days, to February 24, 2006. In support of this motion, the United States asserts:

1. Paragraphs III.B.2, III.C.2, and III.C.3 of the *Amended Procedural and Scheduling Order for the Adjudication of Water Rights Claims in Sub-Areas 4 and 8 of the Zuni River Stream System* (“Amended Procedural and Scheduling Order”) (Doc. No. 387) establish January 10, 2006 as the date by which defendants in all subfiles in Sub-areas 4 and 8 must either

sign and return consent orders proposed by the Plaintiffs United States and the State of New Mexico ex rel. State Engineer (“State”), or file a form answer with the Court.

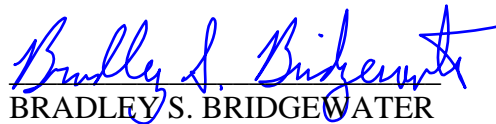
2. The Executor of the defendant estate in Subfile ZRB-1-0087 has waived service of process and, via counsel, has timely returned a *Request for Consultation*.

3. Counsel for the United States discussed the terms of this motion with counsel for the Defendant, Mr. Brian Egolf, and counsel for the State, Mr. Edward Bagley, who concurred in the extension of time sought herein.

Accordingly, the United States respectfully moves the Special Master to extend the Answer date in Subfile ZRB-1-0087 to February 24, 2006.

DATED: January 6, 2006

Respectfully submitted,



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COUNSEL FOR THE UNITED STATES

**CERTIFICATE OF SERVICE**

I hereby certify that, on January 6, 2006, a copy of the forgoing *Motion To Extend Consultation Period And Answer Date* was mailed to the following persons.



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Special Master Vickie L. Gabin  
U.S. District Court  
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