

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,)	
)	
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 Name(s)
ZRB-1-0167	Robert L. Iverson & Nancy G. Iverson
ZRB-2-0010	Deborah Lee Oliver

Subfile	Defendant Name(s)
ZRB-2-0027	Hershel L. Jones
ZRB-2-0036	John B. Davey
ZRB-2-0038	Craig Fredrickson & Regina Fredrickson
ZRB-3-0175	David Swindle & Linda Swindle Trustees
ZRB-3-0176	James A. Farmer & Sharon S. Farmer
ZRB-3-0177	Steven Rowan

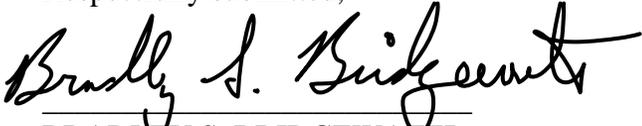
The water uses, or claims to the right to use water, of these persons or entities are subject to the laws of the State of New Mexico and the United States. This Court has exclusive jurisdiction to adjudicate all claims to the right to divert, store, or use public waters of the Zuni River stream system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

2. The persons or entities listed above have been identified by the Hydrographic Surveys for Sub-areas 4 & 8, Sub-areas 9 & 10, and for Sub-area 7 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: July 19, 2006

Respectfully submitted,

Handwritten signature of Bradley S. Bridgewater in black ink, written in a cursive style.

BRADLEY S. BRIDGEWATER

U.S. Department of Justice

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COUNSEL FOR THE UNITED STATES

CERTIFICATE OF SERVICE

I hereby certify that, on July 19, 2006, a copy of the forgoing *Motion to Join Additional Parties Defendant* was mailed to the following persons.



Special Master Vickie L. Gabin
U.S. District Court
District of New Mexico
P.O. Box 2384
Santa Fe, NM 87504-2384

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