

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

UNITED STATES OF AMERICA,)	
and)	07cv00681-BB
ZUNI INDIAN TRIBE)	
Plaintiffs,)	
)	ZUNI RIVER BASIN
-v-)	ADJUDICATION
)	
STATE OF NEW MEXICO, <i>ex rel.</i> State)	Subproceeding 1
ENGINEER, <i>et al.</i>)	Zuni Indian Claims
Defendants)	
_____)	

ORC, LLC, AND JARALOSA CATTLE COMPANY, LLC'S INITIAL DISCLOSURE STATEMENT PURSUANT TO Fed. R. Civ. P. 26(A)(1)

Defendants ORC, LLC, and Jaralosa Cattle Company, LLC (collectively "Defendants"), by and through their undersigned counsel, submit their Initial Disclosure Statement pursuant to Fed. R. Civ. P. 26(a)(1) and the Initial Scheduling and Planning Order, entered in this matter on January 3, 2008. Defendants reserve their right, pursuant to their continuing duty under Fed. R. Civ. P. 26(e)(1) to supplement and/or correct their Initial Disclosure Statement.

A. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION THAT DEFENDANTS MAY USE TO SUPPORT THEIR CLAIMS OR DEFENSES:

1. Mark Reeb
The Reeb Group, Ltd.
2812 N. Norwalk, Suite 105
Mesa, Arizona 85215
(480) 898-9090

Mr. Reeb is a principal and part-owner of ORC, LLC, as well as Jaralosa Cattle Company, LLC. He may have discoverable information with respect to the water rights claims held by these entities in the Zuni River Basin in New Mexico that could be affected by the water rights claims made by the United States and the Zuni Indian Tribe in this matter.

2. Dan Reeb
The Reeb Group, Ltd.
2812 N. Norwalk, Suite 105
Mesa, Arizona 85215
(480) 898-9090

Mr. Reeb is a principal and part-owner of ORC, LLC, as well as Jaralosa Cattle Company, LLC. He may have discoverable information similar to that described above for Mark Reeb.

B. DESCRIPTION BY CATEGORY AND LOCATION OF ALL DOCUMENTS AND TANGIBLE THINGS IN POSSESSION, CUSTODY OR CONTROL OF DEFENDANTS:

1. Maps and photographs depicting the locations of water diversion structures and stock ponds on lands owned by Defendants.

2. Non-exhaustive list of water diversion structures and stock ponds on lands owned by Defendants, dated December 10, 2003.

3. The above documents, to the extent they are in possession, custody or control of Defendants and are not privileged or protected from disclosure, are available for inspection and copying by appointment at the office of counsel for Defendants. To date, specific documents that are subject to the claim of privilege or non-disclosure have not been identified. As documents or materials are reviewed that are subject to a claim of privilege or non-disclosure, such will be identified in particularity and a privilege log will be prepared as provided by Fed. R. Civ. P. 26(b)(5).

C. DESCRIPTION OF CATEGORIES OF DAMAGES:

Not applicable.

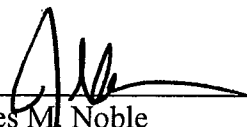
D. INSURANCE AGREEMENTS:

Not applicable.

E. RULE 26(e) SUPPLEMENTATION:

The disclosures made herein are based upon Defendants' current understanding of the claims and defenses asserted and issues raised by the pleadings with particularity. As these claims, defenses and issues are more fully developed during the progress of this proceeding, additional persons with knowledge and/or additional relevant documents may become known. Defendants will supplement or revise the disclosures contained herein in accordance with Fed. R. Civ. P. 26(e).

Respectfully submitted,

By:  _____
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on July 25, 2008, a true and correct copy of the foregoing **ORC, LLC, AND JARALOSA CATTLE COMPANY, LLC'S INITIAL DISCLOSURE STATEMENT PURSUANT TO Fed. R. Civ. P. 26(A)(1)** was served on the following counsel and pro se parties to this subproceeding by U.S. Mail.

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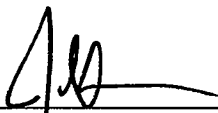
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