

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

<b>UNITED STATES OF AMERICA,</b>	)	<b>07-cv-00681-BB</b>
<b>ET AL.,</b>	)	
	)	
<b>PLAINTIFFS,</b>	)	
	)	
	)	<b>ZUNI RIVER BASIN</b>
	)	<b>ADJUDICATION</b>
<b>v.</b>	)	
	)	
	)	
<b>STATE OF NEW MEXICO</b>	)	
<b>COMMISSIONER OF PUBLIC</b>	)	
<b>LANDS, ET AL.,</b>	)	
	)	<b>Subproceeding 1</b>
<b>DEFENDANTS.</b>	)	<b>Zuni Indian Claims</b>

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**INITIAL DISCLOSURES**

COMES NOW, Law & Resource Planning Associates, P.C. (Tanya L. Scott), on behalf of Broe Land Acquisitions III, LLC, and hereby makes initial disclosures, as required by Fed. R. Civ. P. 26(a)(1), D.N.M. LR-Civ. 26.3, and the Court’s Scheduling Order entered January 3, 2008 [Doc. 151].

**I. Rule 26(a)(1)(A)**

The following individuals are likely to have discoverable information that the disclosing parties may use in support of their defense to this action. Each named individual is a defendant water user within the Zuni Basin.

Broe Land Acquisitions, III, LLC  
c/o Eric D. Swanson & Shawn Maloney  
252 Clayton St.  
Denver, CO 80206

**II. Rule 26(a)(1)(B)**

To the extent now known, documents that the disclosing parties may use in support of their defenses of this matter include the Hydrographic Survey Reports on file in this action, including the individual survey reports for each subfile.

**III. Rule 26(a)(1)(C)**

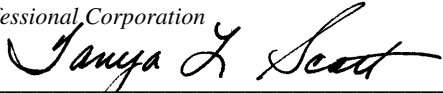
No damages are sought in this litigation.

**IV. Rule 26(a)(1)(D)**

This provision is inapplicable to this litigation.

Respectfully submitted,

LAW & RESOURCE PLANNING ASSOCIATES,  
*A Professional Corporation*

By:  \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that, on July 30, 2008, I filed the foregoing pleading electronically through the CM/ECF system, which caused the parties or counsel reflected on the Notice of Filing to be served by electronic means.

  
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Tanya V. Scott