

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

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

**ZUNI INDIAN TRIBE’S MOTION TO EXTEND DEADLINE FOR
SUBMITTAL OF EXPERT REPORT ON PAST OR PRESENT IRRIGATION BY
MEANS OF PERMANENT WORKS**

The Zuni Indian Tribe, through undersigned counsel Jane Marx, hereby moves the Special Master to extend by 9 days, to March 12, 2009, the deadline for the Zuni Tribe to file its Expert Report concerning Past or Present Irrigation by Means of Permanent Works. In support of this motion, the Zuni Tribe asserts:

1. Paragraph IV.A.2.(b) of the Special Master’s September 24, 2008 *Scheduling Order* (Dkt. 264), requires the Zuni Indian Tribe to file its Expert Report concerning Past or Present Irrigation by Means of Permanent Works by March 3, 2009.
2. The Zuni Indian Tribe, through its technical consultants, has diligently been working on preparation of the Expert Report on Past or Present Irrigation by Means of Permanent Works, but additional time is required to complete the analysis and file the Expert Report.
3. On March 2, 2009, counsel for the Zuni Indian Tribe contacted counsel of

record in the Zuni Indian Claims Subproceeding 1. Counsel has heard from Bradley Bridgewater, counsel for the United States; Bidtah Becker, counsel for the Navajo Nation; Arianne Singer, counsel for the State of New Mexico; and Peter Shoenfeld and James Noble, counsel for various defendants, who had no objection to the 9-day extension requested in this motion. Counsel has not successfully reached Tanya Scott or William Stripp, counsel for other various defendants.

WHEREFORE, the Zuni Indian Tribe respectfully moves the Special Master to extend to March 12, 2009, the deadline for the Zuni Indian Tribe to file its Expert Report on Past or Present Irrigation by Means of Permanent Works.

DATED: March 2, 2009

Electronically Filed,

/s/

Jane Marx
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ATTORNEY FOR ZUNI INDIAN TRIBE

CERTIFICATE OF SERVICE

I hereby certify that, on March 2, 2009, I filed the foregoing *Zuni Indian Tribe's Motion to Extend Deadline for Submittal of Expert Report on Past or Present Irrigation by Means of Permanent Works* electronically through the CM/ECF system in Case Number 07cv00681-BB, which caused CM/ECF Participants to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

_____/s/_____
Jane Marx
Attorney for the Zuni Indian Tribe