

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
)	ADJUDICATION
-v-)	
)	
STATE OF NEW MEXICO, ex rel. State)	Subproceeding 1
ENGINEER, et al.)	Zuni Indian Claims
Defendants)	
_____)	

MOTION TO FURTHER EXTEND TIME FOR RESPONSE TO MOTION FOR
PROTECTIVE ORDER

The Plaintiff United States of America (“United States”) hereby moves the Court to further extend to May 4, 2010 the time within which Defendant Broe Land Acquisitions, III, LLC (“Broe”) may respond to the *United States' Motion for a Protective Order* filed March 2, 2010 [Doc. No. 286]. In support of this motion, the United States asserts:

1. On March 15, 2010, Counsel for Broe, with concurrence by the United States, filed a previous motion seeking to extend Broe’s response date. [Doc. No. 289]. The Special Master granted that that motion on March 16, 2010 [Doc. No. 290], thereby making responses to the United States’ motion due April 2, 2010.

2. Via correspondence dated March 11, 2010, Counsel for Broe responded substantively to a February 23, 2010 request by Counsel for the United States to confer concerning discovery requests served on the United States by Broe. By subsequent communications these parties have agreed there are grounds for further negotiations which may

narrow, or eliminate, their discovery disputes. In order to allow time for those discussions, and in light of competing obligations on the part of counsel for both parties, the parties have agreed to request that the date for responses to the United States' motion be further extended to May 4, 2010.

3. If the parties' discussions in the next few weeks are productive, it is possible the parties will seek a further extension, or that the United States will withdraw its motion.

WHEREFORE, the United States respectfully moves the Court to further extend to May 4, 2010 the time within which Defendant Broe Land Acquisitions, III, LLC may respond to the *United States' Motion for a Protective Order*.

Respectfully submitted,

/s/ Bradley S. Bridgewater

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COUNSEL FOR THE UNITED STATES

CERTIFICATE OF SERVICE

I certify that, on March 25, 2010, I filed the foregoing *Motion to Further Extend Time for Response to Motion for Protective Order* electronically through the CM/ECF system which caused CM/ECF Participants to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

_____/s/_____
Bradley S. Bridgewater