

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

UNITED STATES OF AMERICA and	)	
STATE OF NEW MEXICO, ex rel. STATE	)	
ENGINEER,	)	
Plaintiffs,	)	
	)	
and	)	No. 01cv0072 BB/WDS
ZUNI INDIAN TRIBE and NAVAJO NATION,	)	
Plaintiffs-in-Intervention	)	
	)	
	)	ZUNI RIVER BASIN
v.	)	ADJUDICATION
	)	
A & R PRODUCTIONS, et al.,	)	Subfile No. ZRB-1-0100

SECOND UNOPPOSED JOINT MOTION TO EXTEND TIME WITHIN WHICH TO FILE  
RESPONSES TO DEFENDANT JOANN STRICKLAND, TRUSTEE FOR THE JOANN  
STRICKLAND TRUST'S OBJECTIONS TO SPECIAL MASTER'S REPORT ON MOTION  
TO SET ASIDE DEFAULT JUDGMENT REGARDING SUBFILE NO. ZRB-1-0100

Come Now, the State of New Mexico *ex rel.* State Engineer (“State”) and the United States, by and through their respective undersigned counsel, and hereby move for a second extension of the time within which to file responses to *Objections to Special Master’s Report on Motion to Set Aside Default Judgment* (Doc. No. 2490) (“*Objections*”). In support thereof, the Parties state as follows:

1. On December 10, 2009, Defendant Joann Strickland, Trustee for the Joann Strickland Trust (“Defendant”), filed her *Objections*. Attached as an exhibit to the *Objections* is Defendant’s affidavit, presenting new evidence in support of Defendant’s claims.

2. On December 11, 2009, the State and the United States jointly filed their motion for an extension of time to respond to the Defendant’s *Objections* to January 15, 2010, and the date by which Defendant’s replies must be filed to January 29, 2010 (No. 2491). The Defendant did not oppose, and that motion was granted (No. 2492).

3. Due to the press of business in this and other cases, including the preparation of a status report for the Special Master detailing the progress to date in the adjudication of subfiles in this case, and proposal for the resolution of the remainder, also due on January 15, 2010, both the State and the United States have been unable to prepare their response.

4. Both the State and the United States continue to want an opportunity to respond to Defendant's *Objections*, and to address the new evidence presented.

5. For these reasons, the State and the United States request a second extension of time to respond to Defendant's *Objections* until January 29, 2010, and for Defendant to file a reply to the responses to February 12, 2010.

6. Tanya Scott, counsel for Defendant, has been contacted, and does not oppose this Motion.

WHEREFORE, the State and the United States jointly request that the date by which any responses must be filed to the Defendant's *Objections* be extended to January 29, 2010, and the date by which Defendant's replies must be filed be extended to February 12, 2010.

Electronically Filed

/s/ Edward C. Bagley

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*(approved telephonically)*

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COUNSEL FOR THE UNITED STATES

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on January 12, 2010, I filed the foregoing electronically through the CM/ECF system, which caused the parties or counsel reflected on the Notice of Electronic Filing to be served by electronic means.