## 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,	) No. CV 01-0072 MV/JHR
Plaintiffs,	ZUNI RIVER BASIN ADJUDICATION
and	)
ZUNI INDIAN TRIBE, NAVAJO NATION,	) Subfile No. ZRB-1-0148
Plaintiffs in Intervention,	)
<b>v.</b>	)
A & R PRODUCTIONS, et al.  Defendants.	, ) ) )

## **UNOPPOSED MOTION TO EXTEND DEADLINES**

**COMES NOW**, Norma M. Meech ("Meech"), individually and as the successor-ininterest to Walter V. Meech, by and through her counsel of record, Law & Resource Planning Associates, P.C., and hereby moves the Court for an Order extending the remaining deadlines set in the Court's Order Setting Case Management Deadlines and Discovery Parameters [ECF 3455] by sixty days. As grounds for this Motion, Meech states as follows:

- 1. Meech had retained Doug Irving, a professional engineer and geologist to render expert opinions regarding past water use at the La Tinaja pit mine near Grants, New Mexico, as well as anticipated future water use based upon the limestone deposit in place at the mine site.
- 2. Mr. Irving provided his expert report as required by the Federal Rules of Civil Procedure and the Court's Case Management Order.
  - 3. Mr. Irving unexpectedly passed away on August 15, 2020.

- 4. Meech has retained another expert to review the issues in this matter and render expert opinions.
- 5. Her new expert requires approximately sixty days to review the issues, perform any necessary research, visit the site, and prepare a report.

6. Existing deadlines that need to be extended are as follows:

EVENT REQUESTED NEW DEADLINE

Expert disclosures of newly

retained expert: November 9, 2020

Expert disclosures of any rebuttal

Reports: December 9, 2020

End of Discovery: **February 15, 2020** 

Motions Related to Discovery: February 28, 2020

Pretrial motions other than Discovery motions (including Motions which may require a

Daubert hearing) filed by: March 15, 2021

Pretrial Order from Plaintiff to

Defendant by: May 31, 2021

Pretrial Order to Court by: **June 15, 2021** 

- 7. Meech further requests that the Settlement Mediation set before the United States Magistrate on November 3, 2020 be vacated and rescheduled at a later date.
  - 8. Plaintiffs in this matter have no objection to the requested extension of deadlines.

**WHEREFORE**, for the reasons stated above, Meech respectfully requests that the Court enter an Order extending the remaining deadlines set in the Court's Order Setting Case Management Deadlines and Discovery Parameters [ECF 3455] by sixty days.

Respectfully submitted,

LAW & RESOURCE PLANNING ASSOCIATES,

A Professional Corporation

Tanya L. Scott

Attorneys at Law

Albuquerque Plaza, 201 3rd Street NW, Ste. 1750

Albuquerque, NM 87102

(505) 346-0998 / FAX: (505) 346-0997

## **CERTIFICATE OF SERVICE**

The undersigned certifies that on September 11, 2020 I filed the foregoing *Motion to Extend Deadlines* 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.

Tanya L. Scott