

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

UNITED STATES OF AMERICA, and)	
STATE OF NEW MEXICO, ex rel. STATE)	No. CV 01-00072 MV/JHR
ENGINEER,)	
)	ZUNI RIVER BASIN
Plaintiffs,)	ADJUDICATION
)	
and)	
)	Subfile No. ZRB-1-0148
ZUNI INDIAN TRIBE, NAVAJO NATION,)	
)	
Plaintiffs in Intervention,)	
)	
v.)	
)	
A & R PRODUCTIONS, et al.,)	
)	
Defendants.)	
_____)	

UNITED STATES OF AMERICA’S UNOPPOSED MOTION TO EXTEND DEADLINE

The United States of America hereby moves the Court for an Order extending the deadline for submission of the United States’ rebuttal expert disclosures as set forth in the Court’s Amended Orders Setting Case Management Deadlines and Discovery Parameters [ECF 3476 and 3478]. As grounds in support of this Unopposed Motion, the United States asserts:

1. Defendant Norma M. Meech (“Meech”), individually and as the successor-interest to Walter V. Meech, was compelled to retain a second expert to render expert opinions in this case after Meech’s first expert unexpectedly passed away.
2. Meech submitted her supplemental expert disclosures to Plaintiffs on November 9, 2020; the United States rebuttal expert disclosures are currently due on December 9, 2020.

3. Based on new information contained in the Meech's supplemental expert disclosures, the United States expert, Natural Resources Consulting Engineers, needs an additional two weeks, until December 23, 2020, to prepare and finalize its rebuttal report.

4. The United States does not seek to modify any other deadlines in the Amended Orders Setting Case Management Deadlines and Discovery Parameters (ECF 3476 and 3478).

5. Meech has no objection to the requested deadline extension.

WHEREFORE, for the reasons stated above, the United States respectfully requests that the Court enter an Order extending the deadline for submission of the United States' rebuttal expert disclosures by two weeks, until December 23, 2020.

Dated: December 7, 2020

Respectfully submitted,

/s/ Samuel D. Gollis
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ATTORNEY FOR THE UNITED STATES

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 7, 2020, I filed the foregoing *United States Of America's Unopposed Motion To Extend Deadline* 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/
Samuel D. Gollis