

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. 6:01-cv-00072-DHU-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.)	
_____)	

NOTICE CERTIFYING COMPLETION OF BRIEFING

In accordance with D.N.M.LR-Civ. 7.4(e), Plaintiffs United States of America and State of New Mexico ex rel. State Engineer hereby provide notice certifying that the United States’ and States’ Objections to the Proposed Findings and Recommended Disposition (Doc. 3547) is ready for decision. The specific filings relating to the Objections are:

1. Plaintiffs United States of America’s and State of New Mexico’s Motion for Summary Judgment and Memorandum of Law in Support Thereof (Mar. 15, 2021) (Doc. 3491) (“Mot. for Summ. J.”);
2. Declaration of Thomas W. Ley (Ex. 1 to Mot. for Summ. J.) (Mar. 15, 2021) (Doc. 3491-1);
3. Walter Meech Deposition Excerpts (Ex. 2 to Mot. for Summ. J.) (Mar. 15, 2021) (Doc. 3491-2);

4. File G-336 Amended Well Declaration (Meech Dep. Ex. 3) (Mar. 15, 2021) (Doc. 3491-3);
5. File G-337 Amended Well Declaration (Meech Dep. Ex. 4) (Mar. 15, 2021) (Doc. 3491-4);
6. Edward Morlan Deposition Excerpts (Ex. 3 to Mot. to Summ. J.) (Mar. 15, 2021) (Doc. 3491-5);
7. Norma Meech's Response to Plaintiffs' Motion for Summary Judgment (Apr. 12, 2021) (Doc. 3496) ("Meech Resp.");
8. Affidavit of Walter L. Meech (Ex. A to Meech Resp.) (Apr. 12, 2021) (Doc. 3496-1);
9. Karl Hoffman Deposition Excerpts (Ex. B to Meech Resp.) (Apr. 12, 2021) (Doc. 3496-2);
10. Subfile Order (Ex. C. to Meech Resp.) (Apr. 12, 2021) (Doc. 3496-3);
11. Judgment and Decree re Water Storage Rights – Storrie Project (Ex. D to Meech Resp.) (Apr. 12, 2021) (Doc. 3496-4);
12. Findings of Fact and Conclusions of Law, Case CV-96-888 (Ex. E to Meech Resp.) (Apr. 12, 2021) (Doc. 3496-5);
13. Plaintiffs United States of America's and State of New Mexico's Reply in Support of Motion for Summary Judgment (May 10, 2021) (Doc. 3504) ("Reply");
14. Second Declaration of Thomas W. Ley (Ex. 1 to Reply) (May 10, 2021) (Doc. 3504-1);
15. Alan Kuhn Expert Report (Ex. 2 to Reply) (May 10, 2021) (Doc. 3504-2);
16. Alan Kuhn Deposition Excerpts (Ex. 3 to Reply) (May 10, 2021) (Doc. 3504-3);
17. Meech Discovery Excerpts (Ex. 4 to Reply) (May 10, 2021) (Doc. 3504-4);
18. Meech Initial Disclosure Excerpts (Ex. 5 to Reply) (May 10, 2021) (Doc. 3504-5);
19. Second Walter Meech Deposition Excerpts (Ex. 6 to Reply) (May 10, 2021) (Doc. 3504-6);
20. Second Edward Morlan Deposition Excerpts (Ex. 7 to Reply) (May 10, 2021) (Doc. 3504-7);

21. Norma Meech's Surreply in Opposition to Plaintiffs' Motion for Summary Judgment (Oct. 19, 2021) (Doc. 3528);
22. Affidavit of Walter Meech (Oct. 19, 2021) (Doc. 3528-1);
23. Proposed Findings and Recommended Disposition (Mar. 31, 2022) (Doc. 3547);
24. Plaintiffs United States of America's and State of New Mexico's Objections to Proposed Findings and Recommended Disposition (Doc. 3553); and
25. Norma Meech's Response to Plaintiffs' Objections to Proposed Findings and Recommended Disposition (Doc. 3556).

DATED: June 6, 2022

Respectfully submitted,

TODD KIM
Assistant Attorney General
Environment & Natural Resources Division



SAMUEL D. GOLLIS, Trial Attorney
ANDREW "GUSS" GUARINO, Trial Attorney
BRADLEY S. BRIDGEWATER, Trial Attorney
Indian Resources Section
Environment & Natural Resources Division
United States Department of Justice
999 18th Street, South Terrace, Suite 370
Denver, CO 80202
Telephone: (303) 844-1351 (Gollis)
Telephone: (303) 844-1343 (Guarino)
Telephone: (303) 844-1359 (Bridgewater)
Email: samuel.gollis@usdoj.gov
Email: guss.guarino@usdoj.gov
Email: bradley.s.bridgewater@usdoj.gov

Attorneys for Plaintiff United States of America

Email approval granted 06/06/2022

EDWARD C. BAGLEY
Special Assistant Attorney General
Office of the New Mexico State Engineer
P.O. Box 25102
Santa Fe, NM 87504-5102
Telephone: (505) 827-6150
Email: edward.bagley@state.nm.us

Attorney for Plaintiff State of New Mexico

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 6, 2022, I filed the foregoing *Notice Certifying Completion of Briefing* 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.



Samuel D. Gollis