

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. 01cv00072 BB-ACE
)
ZUNI INDIAN TRIBE, NAVAJO NATION,) ZUNI RIVER BASIN
) ADJUDICATION
Plaintiffs in Intervention,)
)
v.)
)
A&R PRODUCTIONS, et al.)
)
Defendants.)
_____)

MOTION TO JOIN ADDITIONAL PARTIES DEFENDANT

The United States of America (“United States”) hereby respectfully requests the Court to join as additional parties the persons or entities named below and order them to answer the United States’ Complaint in this action as required in any civil action in the United States District Court or suffer default judgment against them. In support of this motion, the United States asserts:

1. The persons or entities listed below are diverting and using or may claim a right to divert and use surface or underground waters within the Zuni River stream system in New Mexico.

Katherine L. Clark, a.k.a. Katherine L.
Belford

ZRB-1-0007

P.O. Box 893
Ramah, NM 87321

Janet N. O'Connor, Co-Trustee	ZRB-1-0016	Box 12000 Ice Caves Rd. Grants, NM 87020
Michael Normandin	ZRB-1-0020	310 N. Angeline Cr. Prescott, AZ 86303
Barbara Normandin	ZRB-1-0020	310 N. Angeline Cr. Prescott, AZ 86303
Dana Binnion	ZRB-1-0030	HC 61, Box 44 Ramah, NM 87321
Raymond Jose	ZRB-1-0047	HC 61, Box 5027 Ramah, NM 87321
Susan Mayne	ZRB-1-0061	HC 61, Box 5032 Ramah, NM 87321
Vickie J. Meech	ZRB-1-0064	P.O. Box 2479 Milan, NM 87021
Michael J. Sheets	ZRB-1-0093	200 Oso Ridge Rt. Grants, NM 87020
Steven D. Sheets	ZRB-1-0093	200 Oso Ridge Rt. Grants, NM 87020
John L. Bandera	ZRB-1-0107	P.O. Box 3056 Ramah, NM 87321
Colette Bandera	ZRB-1-0107	P.O. Box 3056 Ramah, NM 87321
Ranchers State Bank of Belen	ZRB-1-0109	P.O. Box 545 Belen, NM 87002
Meech-Cash, LLC	ZRB-1-0115	P.O. Box 2547 Milan, NM 87021
David Bradford	ZRB-1-0131	3629 West 44 th Terrace Indianapolis, IN 46228
Evelyn Bradford	ZRB-1-0131	3629 West 44 th Terrace Indianapolis, IN 46228

Claudine C. & Mark C. McAnelly, Revocable Trust, DTD	ZRB-1-0132	9315 Galaxia Way NE Albuquerque, NM 87111
Westley R. Logan	ZRB-1-0135	51 Tierra Madre Rd. Placitas, NM 87043
Anthony & Rebecca Allina Family Trust	ZRB-1-0137	1424 E. Valley Rd. Santa Barbara, CA 93108

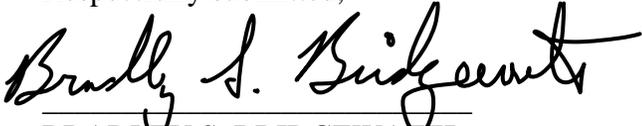
The water uses, or claims to the right to use water, of these persons or entities are subject to the laws of the State of New Mexico and the United States. This Court has exclusive jurisdiction to adjudicate all claims to the right to divert, store, or use public waters of the Zuni River stream system in New Mexico.

2. The persons or entities listed above are in Sub-area 4 or 8 of the Zuni River stream system and may be diverting and using water associated with the subfile numbers listed, or may otherwise be using or diverting surface or underground waters within the Zuni River stream system.

3. For the benefit of other parties, and by way of explanation, the United States asserts that motions to add additional defendants, dismiss defendants, correct defendants' names, and take other corrective action, are parts of an on-going process made necessary by the hydrographic survey, defendants' responses, and other kinds of new information received during the course of this adjudication. The United States advances such motions primarily for the purpose of ensuring that the Court's records indicate as accurately as possible the persons or entities that are parties to this case.

DATED: December 12, 2005

Respectfully submitted,

Handwritten signature of Bradley S. Bridgewater in black ink, written in a cursive style.

BRADLEY S. BRIDGEWATER

U.S. Department of Justice

999 18th St., Suite 945 North

Denver, CO 80202

(303) 312-7318

COUNSEL FOR THE UNITED STATES

CERTIFICATE OF SERVICE

I hereby certify that, on December 12, 2005, a copy of the forgoing *Motion to Join Additional Parties Defendant* was mailed to the following persons.



Bradley J. Bairants

Special Master Vickie L. Gabin
U.S. District Court
District of New Mexico
P.O. Box 2384
Santa Fe, NM 87504-2384

Karla McCall, Data Manager
1315 Sagebrush Dr. S.W.
Los Lunas, NM 87031

Edward Bagley
Office of the State Engineer, Legal Division
P.O. Box 25102
Santa Fe, NM 87504