

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

UNITED STATES OF AMERICA,)	
and)	
STATE OF NEW MEXICO, <i>ex rel.</i> STATE)	
ENGINEER,)	
)	
Plaintiffs,)	
)	No. 01cv00072 BB-ACE
and)	
)	ZUNI RIVER BASIN
ZUNI INDIAN TRIBE, NAVAJO NATION,)	ADJUDICATION
)	
Plaintiffs in Intervention,)	Sub-areas 4 & 8
)	
v.)	Subfile ZRB-1-0087
)	
A&R PRODUCTIONS, et al.)	
)	
Defendants.)	
)	

**JOINT MOTION TO EXTEND CONSULTATION PERIOD AND ANSWER
DATE**

The United States of America (“United States”) and the Estate of Catherine Reinschmidt, Defendant, by and through their undersigned attorneys, hereby move the Special Master to allow additional time for consultations concerning Subfile ZRB-1-0087, by extending the Defendant’s deadline for filing a form Subfile *Answer* by an additional 45 days, to April 10, 2006. In support of this motion, the movants assert:

1. Paragraphs III.B.2, III.C.2, and III.C.3 of the *Amended Procedural and Scheduling Order for the Adjudication of Water Rights Claims in Sub-Areas 4 and 8 of the Zuni River Stream System* (“Amended Procedural and Scheduling Order”) (Doc. No. 387) establish January 10, 2006 as the date by which defendants in all subfiles in Sub-areas 4 and 8 must either sign and return consent orders proposed by the Plaintiffs

United States and the State of New Mexico ex rel. State Engineer (“State”), or file a form answer with the Court.

2. By an Order entered January 9, 2006 (Doc. No. 462), the Special Master granted the United States’ motion to extend Defendant’s Answer date to February 24, 2006.

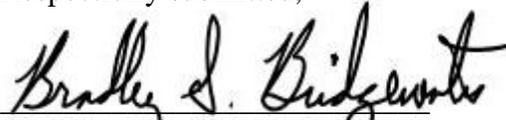
3. The Defendant has timely returned a *Request for Consultation* to the United States in accordance with the requirements set forth in the Amended Procedural and Scheduling Order. Based on information provided by Defendant during consultation, the United States intends to conduct an additional field inspection concerning Defendant’s water uses. Due to the press of other tasks related to this case being performed by the United States’ hydrographic survey team, that field inspection has not been completed. Once the inspection is completed, the United States intends to propose a revised Consent Order concerning this subfile to counsel for Defendant and counsel for the State.

4. Counsel for the United States has obtained the concurrence of Counsel for the State of New Mexico, Mr. Edward Bagley, in this request.

Accordingly, the United States and the Estate of Catherine Reinschmidt respectfully move the Special Master to extend the Answer date in Subfile ZRB-1-0087 to April 10, 2006.

DATED: February 22, 2006

Respectfully submitted,



BRADLEY S. BRIDGEWATER
U.S. Department of Justice
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Denver, CO 80202
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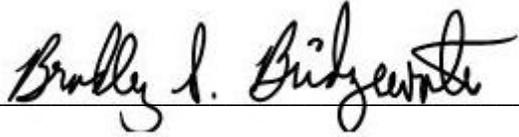
COUNSEL FOR THE UNITED STATES

/telephonic approval (2/22/06)
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COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that, on February 22, 2006, a copy of the forgoing *Motion To Extend Consultation Period And Answer Date* was mailed to the following persons.



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

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