

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)
ZUNI INDIAN TRIBE, AND)
NAVAJO NATION,)
 Plaintiffs in Intervention)
)
vs.)
)
A. & R. PRODUCTIONS, *et. al.*)
)
 Defendants.)
_____)

01 CV-00072-BB-ACE

ZUNI RIVER BASIN ADJUDICATION

**JOINT MOTION FOR EXTENSION OF TIME TO
ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

COME NOW, Broe Land Acquisitions III, LLC, ("Broe") by and through its counsel, Sheehan, Sheehan & Stelzner, P.A. (John W. Utton), the United States of America ("United States"), by and through its attorney, Bradley S. Bridgewater, U.S. Department of Justice, and the State of New Mexico *ex rel.* State Engineer ("State"), by and through its attorney, Edward C. Bagley, Special Assistant Attorney General, Office of the State Engineer, (collectively the "Parties") and asks the Court for a 90-day extension for Broe to answer or otherwise respond to the Complaint. Broe needs the additional time to conduct technical investigation of the water uses on its lands.

WHEREFORE, the Parties jointly request that the Court enter an Order granting Broe an extension of time to November 10, 2006 to answer or otherwise respond to the Complaint.

Respectfully submitted,

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By: *Susan C Key for*
JOHN W. UTTON

Approved By:

COUNSEL FOR THE UNITED STATES

electronically approved August 9, 2006

BRADLEY S. BRIDGEWATER
U.S. Department of Justice
1961 Stout Street - 8th Floor
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(303) 844-1359

COUNSEL FOR THE STATE OF NEW MEXICO *EX REL.* STATE ENGINEER

electronically approved August 10, 2006

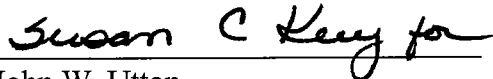
EDWARD C. BAGLEY
Special Assistant Attorney General
Office of the State Engineer
P. O. Box 25102
Santa Fe, New Mexico 87503
(505) 827-6150

CERTIFICATE OF SERVICE

I HEREBY certify that a true copy of the foregoing pleading was mailed this 11th day of August, 2006 to:

Bradley Bridgewater, Esq.
United States Department of Justice
Environment & Natural Resources Division
1961 Stout Street, 8th Floor
Denver, Colorado 80294

Edward C. Bagley, Esq.
Special Assistant Attorney General
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John W. Utton