

DISTRICT COURT  
SAN JUAN COUNTY NM  
FILED

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STATE OF NEW MEXICO  
COUNTY OF SAN JUAN  
ELEVENTH JUDICIAL DISTRICT COURT

STATE OF NEW MEXICO, *ex rel.*  
THE STATE ENGINEER,

Plaintiff,

vs.

THE UNITED STATES OF AMERICA, *et al.*,

Defendants.

**AB-07-1**

Claims of Navajo Nation

No. CV 75-184

Honorable James J. Wechsler

Presiding Judge

DESCRIPTIVE SUMMARY: Notice of deposition of John Leeper on February 27, 2013.

NUMBER OF PAGES: 3

DATE OF FILING: February 21, 2013

**NOTICE OF DEPOSITION OF JOHN LEEPER**

Pursuant to Rule 1-030, NMRA, the Community Ditch Defendants hereby give notice that a telephonic deposition of Dr. John Leeper will be taken on February 27, 2013, beginning at 9:30 a.m., and continuing until concluded, by stenographic means before a certified court reporter, in Albuquerque, New Mexico, by Victor R. Marshall, counsel for the Community Ditch Defendants.

The deponent is asked to bring to the deposition and to provide in advance the documents listed on Exhibit A, attached hereto.

*D*

Respectfully submitted,

VICTOR R. MARSHALL & ASSOCIATES, P.C.

By /s/ Victor R. Marshall

Victor R. Marshall  
Attorneys for San Juan Agricultural Water Users  
Association; Hammond Conservancy District;  
Bloomfield Irrigation District; various ditches; and  
various members thereof.  
12509 Oakland NE  
Albuquerque, NM 87122  
505-332-9400 / 505-332-3793 FAX

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of February, 2013, a true and correct copy of the foregoing was served on the parties and claimants by attaching a copy of said document to an email sent to the following list server: [wnavajointerse@nmcourts.gov](mailto:wnavajointerse@nmcourts.gov) and to the filing list referred to in paragraph 8 of the court's November 19, 2012 Corrected Order.

/s/ Victor R. Marshall

Victor R. Marshall, Esq.

**EXHIBIT A**

1. Any reports prepared by Dr. Leeper regarding the pending action;
2. All documents that reflect the substance of the fact to which Dr. Leeper is expected to testify;
3. All documents that reflect the substance of the opinions to which Dr. Leeper is expected to testify;
4. All documents which summarize the grounds for each opinion to which Dr. Leeper is expected to testify;
5. A list of all publications authored by Dr. Leeper within the preceding ten years; and
6. A list of all cases in which Dr. Leeper has testified as an expert at trial or by deposition within the preceding four years.

Items 1 - 6 above were listed on the original ConocoPhillips deposition notice. In addition, please bring and provide:

7. All documents used or consulted by you in preparation of, or referred to in "Report on San Juan River Basin in New Mexico Navajo Nation Water Rights Settlement Agreement," with approximate date of February 8, 2013. See highlighted copy of report provided to Mr. Pollack.
8. All documents you used or consulted in the preparation of the Navajo Nation's responses to Interrogatory No. 7 of the *Responses and Objections of the Navajo Nation to the Marshall Parties' Additional Interrogatories on NIP*.