

DISTRICT COURT
SAN JUAN COUNTY NM
FILED *OK*
2018 JUL 30 PM 2:11

STATE OF NEW MEXICO
SAN JUAN COUNTY
ELEVENTH JUDICIAL DISTRICT COURT

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

Plaintiff,

v.

D-1116-CV-75-184
Hon. James J. Wechsler
Presiding Judge

SAN JUAN RIVER STREAM SYSTEM
ADJUDICATION

THE UNITED STATES OF AMERICA

et al.,
Defendants,

vs.

THE JICARILLA APACHE TRIBE and the
NAVAJO NATION,

Defendant-Intervenors.

**STATE OF NEW MEXICO'S SECOND MOTION FOR EXTENSION OF TIME TO
FILE A PROPOSED PLAN TO BEGIN AND COMPLETE A HYDROGRAPHIC
SURVEY OF THE SAN JUAN MAINSTEM**

The State of New Mexico hereby moves for an extension of time until Wednesday, August 1, 2018 to file its proposed plan to begin and complete a hydrographic survey of the San Juan Mainstem. In support, the State states the following:

1. On May 21, 2018, the Court entered its *Order Concerning Briefing on the Fifth Amended Case Management Order*, which ordered at page 2 that "by July 21, 2018, the State shall file a proposed plan to begin and complete a hydrographic survey of the San Juan Mainstem."

2. On July 24, 2018, the Court granted the State's July 23, 2018 *Motion*, and

extended the time for it to file its proposed plan to begin and complete a hydrographic survey of the San Juan Mainstem for four (4) days, until Friday, July 27, 2018.

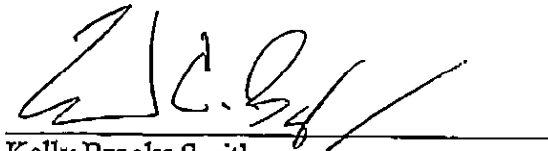
3. The State has faced other difficulties in the interim, specifically the fact that its computer server has been intermittently down for much of the additional time the Court had granted. In addition, it has taken the State longer than anticipated to gather the data regarding estimates of time for completing the phases of the hydrographic survey.

4. No party would be prejudiced by an extension of time until Wednesday, August 1, 2018.

5. Given the large number of opposing counsel, contacting all of them in advance of this filing was not possible.

WHEREFORE the State of New Mexico requests the Court grant this motion and extend the time for it to file its proposed plan to begin and complete a hydrographic survey of the San Juan Mainstem until Wednesday, August 1, 2018.

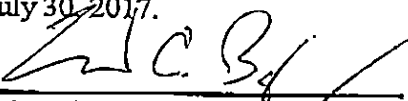
Respectfully submitted,



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CERTIFICATE OF SERVICE

I certify that I have caused a copy of the above to be served by E-mail to all Counsel on the electronic service list for D-1116-CV-7500184 by using wrattorney-grp@nmcourts.gov on July 30, 2017.



Edward Charles Bagley