

2019 FEB -4 PM 4: 20

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

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

v.

D-1116-CV-75-184

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

San Juan River Adjudication
Hon. James J. Wechsler, Presiding Judge

and

JICARILLA APACHE TRIBE and
The NAVAJO NATION,
Defendant-Intervenors.

Name of Party: The Navajo Nation

Descriptive Summary: The Navajo Nation files a motion to quash the *First Discovery to Navajo Nation* served and filed on January 23, 2019, by Chris Velasquez, Linda Corwin and San Juan Agricultural Water Users Association.

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NAVAJO NATION'S MOTION TO QUASH

The Navajo Nation files this Motion to Quash the *First Discovery to Navajo Nation* served and filed on January 23, 2019, by Chris Velasquez, Linda Corwin and San Juan Agricultural Water Users Association ("Movants"). As grounds for this motion, the Nation asserts that discovery in this adjudication may only be "conducted by leave of the Court." *Fifth Amended Case Management Order*, Sep. 22, 2008, ¶ X.1. Movants have not sought leave of the

Court to propound discovery on the Navajo Nation. Accordingly, the Navajo Nation requests the Court to quash the *First Discovery to Navajo Nation*.

Pursuant to Rule 1-007.1(C) NMRA, concurrence from counsel for Movants was sought. Counsel for movants opposes the motion.

Respectfully submitted this 4th day of February, 2019.

NAVAJO NATION DEPARTMENT OF JUSTICE



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CERTIFICATE OF FILING AND SERVICE

I certify that on this 4th day of February, 2019, an electronic version of this document was filed by electronic mail to: sjcwaterfilings@nmcourts.gov and served by electronic mail to: sanjuanwater@nmcourts.gov



Stanley M. Pollack