

2019 OCT 17 AM 11: 26

STATE OF NEW MEXICO
SAN JUAN COUNTY
ELEVENTH JUDICIAL DISTRICT COURT

STATE OF NEW MEXICO, ex rel.
STATE ENGINEER,

Plaintiff,

v.

THE UNITED STATES OF AMERICA, et al.,

Defendants,

v.

THE JICARILLA APACHE TRIBE and the
NAVAJO NATION,

Defendants-Intervenors.

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

SAN JUAN RIVER STREAM
SYSTEM ADJUDICATION

REVISED CERTIFICATE OF SERVICE

We hereby certify that the attached Discovery About Individuals Likely To Have Discoverable Information was served by email on the Navajo Nation via attorneys Stanley M. Pollack, smpollack@nndoj.org and M. Kathryn Hoover, khoover@nndoj.org; and the United State via attorneys Mark R. Haag, Mark.Haag@usdoj.gov and Guss Guarino, Guss.Guarino@usdoj.gov, on October 2, 2019, by movants Chris Velasquez, Linda Corwin, and San Juan Agricultural Water Users Association.

Respectfully submitted,

VICTOR R. MARSHALL & ASSOCIATES, P.C.

By /s/ Victor R. Marshall

Victor R. Marshall
Limited Special Appearance as Attorneys for
Movants Velasquez, Corwin and
San Juan Agricultural Water Users Association
12509 Oakland NE
Albuquerque, NM 87122
505-332-9400
victor@vrmarshall.com

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of October, 2019, a true and correct copy of the foregoing was served on the all counsel on the Electronic Service List for D-1116-CV-7500184 by emailing the filing to sanjuanwater-grp@nmcourts.gov and sanjuanwater@nmcourts.gov.

/s/ Victor R. Marshall

Victor R. Marshall, Esq.

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**DISCOVERY ABOUT INDIVIDUALS
LIKELY TO HAVE DISCOVERABLE INFORMATION**

To: Navajo Nation
% Stanley M. Pollack, Contract Attorney
M. Kathryn Hoover, Principal Attorney
Navajo Nation Department of Justice
Post Office Drawer 1010
Window Rock, Navajo Nation (AZ) 86515

and

United States	Andrew "Guss" Guarino, Trial Attorney
% Mark R. Haag, Attorney	Indian Resources Section
Environment & Natural Res. Div.	Environment and Nat'l Res. Div.
U.S. Department of Justice	U.S. Department of Justice
P.O. Box 7415	999 18th Street
Washington, D.C. 200044	South Terrace, Suite 370
	Denver, CO 80202

Pursuant to Rule 1-026(B)(3) Movants propound the following discovery to the
Navajo Nation and separately to the United States.

1. Please provide the name, address, and telephone number of each individual likely to have discoverable information concerning DNA's work on Navajo water rights during the period from the inception of DNA or its predecessors through 1978.

2. Please provide the name, address, and telephone number of each individual likely to have discoverable information concerning Navajo legal claims for water rights during the period from the inception of DNA or its predecessors through 1978, other than the individuals identified in the answer to the preceding interrogatory.

3. Please provide the name, address, and telephone number of each individual who worked in the Window Rock office of DNA, or the DNA litigation and law reform unit ("LLRU") during the period from the inception of DNA or its predecessors through 1978.

4. Produce any records relating to your answers to the foregoing.

This discovery includes, but is not limited to, the following individuals: Peterson Zah, Peter MacDonald, Ben Hanley, Theodore Mitchell, Michael Gross, Daniel McMeekin, Robert Hilgendorf, James Wechsler, Paul Biderman, and Carl Todacheene. This request includes staff, employees, and persons who are not lawyers. It also includes

each individual likely to have discoverable information concerning any of the documents filed in connection with the pending Rule 1-054(B) motion.

Dated: October 2, 2019

Respectfully submitted,

VICTOR R. MARSHALL & ASSOCIATES, P.C.

By /s/ Victor R. Marshall

Victor R. Marshall
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