

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

)	
STATE OF NEW MEXICO, ex rel. STATE)	
ENGINEER,)	
)	
Plaintiff,)	
)	
v.)	
)	
R. LEE AAMODT, et al.,)	No. 66cv6639 MV/WPL
)	
Defendants,)	
)	
And)	
)	
UNITED STATES OF AMERICA,)	
PUEBLO DE NAMBÉ,)	
PUEBLO DE POJOAQUE,)	
PUEBLO DE SAN ILDEFONSO, and)	
PUEBLO DE TESUQUE,)	
)	
Plaintiffs-in-Intervention.)	

**DEFENDANT-OBJECTORS MOTION FOR EXTENSION OF TIME AND
MODIFICATION OF CASE MANAGEMENT ORDER¹**

Defendant-Objectors Group 1, by their undersigned attorney, file their Motion for Extension of Time to file their response to the multiple memorandum in support of Settling Parties and modification of the Court’s Case Management Order ECF. No 9506 stating as follows:

1. The Court has initially granted the Settling Parties 90 days in which to file the memorandum in support of the entry of the settlement. The Court is only granting to

¹ Pursuant to the Local Rule, the position of the parties was sought and the motion is opposed. Settling Parties US and 4 Pueblos opposed this Motion; counsel for Settling Parties Rio Pojoaque Acequia and Water Well Association, Inc. extended the professional courtesy of agreeing to a 30 day extension to respond to their brief; Settling Party City of Santa Fe took no position on the Motion; the Objecting Atencio Parties support the Motion and all other parties gave no response.

Objecting Parties 60 days to respond the multiple filings many of which are in excess of 60 pages. Following which the Settling parties will also get another bite at the apple after 30 days to file a Reply. The schedule as currently set by this Court is unfair to objecting parties.

2. Further, Group 1 offers to the Court that there is proposed draft legislation for the upcoming New Mexico Legislative Session that directly impacts and would serve to clarify issues pending before this Court. The New Mexico Legislative session will conclude in March of 2015.
3. As a matter of fairness to the over 800 objecting parties, the majority of which are unrepresented by legal counsel this Court should allow the Objecting parties to have at least 150 days from the filing of the memorandum of support to file their responses. Allowing Group 1 and the other objecting parties this additional time will not cause any undue prejudice to the parties and may serve to allow for time for further resolution or clarification of issues between the settling and objecting parties.

Respectfully submitted,

/s/ A. Blair Dunn, Esq.

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CERTIFICATE OF SERVICE

I CERTIFY that I filed the foregoing document on November 8, 2014 using the ECF System, which will send notification to all parties of record.

Electronically Signed by – A. Blair Dunn
A. Blair Dunn, Esq.,