

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

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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.	)	

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**DEFENDANT-OBJECTORS REPLY TO SETTling PARTIES' RESPONSES TO MOTION FOR EXTENSION OF TIME AND MODIFICATION OF CASE MANAGEMENT ORDER**

Defendant-Objectors Group 1, by their undersigned attorney, file their Reply to the Settling Parties' Responses to the 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. Good cause has been shown by Movant. Fundamental fairness is absolutely good cause to give a party with fewer resources additional time to address and respond to **over 150 pages of briefing.**
2. Settling Parties harangue Movants for waiting until November 8, 2014 to file their Motion

for extension, but Movants respectfully ask the Court to take note of the fact that Movants make this request in good faith, having viewed the voluminous and extremely technical pleadings of the Settle Parties that they be allowed additional time to adequately address those pleadings. If 4 sets of attorneys were given 90 days each to come up with a total of **over** 150 pages of briefing, it is very hard to see why a request for 150 days for parties that lack the immense and vast resources of the Federal Government and State Government to respond to those briefs is not appropriate or fair for this Court.

3. As a matter of fairness of fundamental fairness allowing Objectors at least 150 days from the filing of the memorandum of support to file their responses is correct. Good cause exists in the form of fair play and equal opportunity(time) at minimum not less to address extensive documents. 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 December 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..