

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

STATE OF NEW MEXICO  
State Engineer, *ex rel.*

Plaintiff,

v.

R. LEE AAMODT,  
*et al.*,  
Defendants.

and  
UNITED STATES OF AMERICA,  
PUEBLO DE NAMBE,  
PUEBLO DE POJOAQUE,  
PUEBLO DE SAN ILDEFONSO,  
and PUEBLO DE TESUQUE,  
Plaintiffs-in-Intervention

No. 66cv06639 WJ/WPL

**FOURTEENTH MOTION TO JOIN PRE-MORATORIUM  
CLAIMANTS AS ADDITIONAL PARTIES DEFENDANT**

The State of New Mexico, *ex rel.* State Engineer (“State”) hereby respectfully requests the Court to join as additional parties defendant the person or persons or entities named below and order them to answer the State’s Complaint in this action as required in any civil action in the United States District Court or suffer default judgment against the party. In support of this motion, the State asserts:

1. The persons or entities listed below are diverting and using or may claim a right to divert and use a domestic well and the underground waters within the Nambé, Pojoaque, and Tesuque stream system in New Mexico:

<u>Name</u>	<u>Address</u>	<u>Subfile(s)</u>
CASH, HARVEY B.	369 MONTEZUMA AVE. #106 SANTA FE, NM 87501	AAM-RG-27938
CASH, JO BETH M.	369 MONTEZUMA AVE. #106 SANTA FE, NM 87501	AAM-RG-27938
CELUZZA, MICHAEL M.	369 MONTEZUMA #174 SANTA FE, NM 87501	AAM-RG-18448
CERRETA, ELLEN	1 JERRY HATCHET LANE SANTA FE, NM 87506	AAM-RG-26377
COYOTE TRAILS INC.	P.O. BOX 8980 SANTA FE, NM 87504	AAM-RG-03624
GARDUNO, LEONARD A.	RT. 1, BOX 88 SANTA FE, NM 87501	AAM-RG-37289
MARTINEZ, DIANE P.	144 TANO ROAD SANTA FE, NM 87506	AAM-RG-36347
MARTINEZ, RONALD G.	144 TANO ROAD SANTA FE, NM 87506	AAM-RG-36347
MELEGA, JACQUELINE A.	369 MONTEZUMA #174 SANTA FE, NM 87501	AAM-RG-18448
MONDRAGON, ROBERT E.	205 CAMINO DE RINCON SANTA FE, NM 87506	AAM-RG-19953
MONDRAGON, VIOLA A.	205 CAMINO DE RINCON SANTA FE, NM 87506	AAM-RG-19953
ONSTOTT, JENNIFER M.	777 N. INDIAN HILL BLVD CLAREMONT, CA 91711	AAM-RG-23432
REYNOLDS, MEREDITH	P.O. BOX 156 PESCADERO, CA 94060	AAM-RG-37601
RING, L. MERRILL	777 N. INDIAN HILL BLVD CLAREMONT, CA 91711	AAM-RG-23432
ROYBAL-SAMAYOA, MICHELLE	138 COUNTY ROAD 84D SANTA FE, NM 87506	AAM-RG-07435
SEGLER, JEFF	12 COUNTY ROAD 113 S. SANTA FE, NM 87506	AAM-RG-23078
SEGLER, SUSAN	12 COUNTY ROAD 113 S. SANTA FE, NM 87506	AAM-RG-23078
TRUJILLO, CARL P.	1 JERRY HATCHET LANE SANTA FE, NM 87506	AAM-RG-26377
TRUJILLO, ERNEST E.	2 HUERFANA LANE SANTA FE, NM 87506	AAM-RG-24657
TRUJILLO, IRENE I.	2 HUERFANA LANE SANTA FE, NM 87506	AAM-RG-24657
VIGIL, JOSEPH R	02 RICARDOS COURT SANTA FE, NM 87506	AAM-RG-11260
VIGIL, MATILDE	138 COUNTY RD. 84D SANTA FE, NM 87594	AAM-RG-07435

2. The water uses, or claims to the right to use water, of these persons or entities are subject to the laws of the State of New Mexico and the United States. This Court has exclusive jurisdiction to adjudicate all claims to the right to divert, store, or use public waters of the Nambé, Pojoaque, and Tesuque stream system in New Mexico;

3. The persons or entities listed above may be diverting and using water associated with the subfile number listed, or may otherwise be using or diverting the underground waters within the Nambé, Pojoaque, and Tesuque stream system;

4. For the benefit of other parties, and by way of explanation, the State asserts that motions to add additional defendants, dismiss defendants, correct defendants' names, and take other corrective action, are parts of an on-going process made necessary by court process and procedures, the hydrographic survey, defendants' responses and other kinds of new information received during the course of this adjudication. The State advances such motions primarily for the purpose of ensuring that the Court's records indicate as accurately as possible the persons or entities that are parties to this case.

Electronically Filed

/s/ Edward C. Bagley  
EDWARD C. BAGLEY

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Attorney for the State Of New Mexico, *ex rel.*  
State Engineer

**CERTIFICATE OF SERVICE**

I hereby certify that on the 21 of July 2015, I filed the foregoing electronically through the CM/ECF system which caused the parties on the electronic service list, as more fully set forth in the Notice of Electronic Filing, to be served via electronic mail, and served the following non-CM/ECF participants attached as Exhibit A via first class mail, postage prepaid.

/s/ Edward C. Bagley  
EDWARD C. BAGLEY

**Exhibit A**

HARVEY B. CASH	369 MONTEZUMA AVE. #106, SANTA FE, NM 87501
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JENNIFER M. ONSTOTT	777 N. INDIAN HILL BLVD, CLAREMONT, CA 91711
MEREDITH REYNOLDS	P.O. BOX 156, PESCADERO, CA 94060
L. MERRILL RING	777 N. INDIAN HILL BLVD, CLAREMONT, CA 91711
MICHELLE ROYBAL-SAMAYOA	138 COUNTY ROAD 84D, SANTA FE, NM 87506
JEFF SEGLER	12 COUNTY ROAD 113 S., SANTA FE, NM 87506
SUSAN SEGLER	12 COUNTY ROAD 113 S., SANTA FE, NM 87506
CARL P. TRUJILLO	1 JERRY HATCHET LANE, SANTA FE, NM 87506
ERNEST E. TRUJILLO	2 HUERFANA LANE, SANTA FE, NM 87506
IRENE I. TRUJILLO	2 HUERFANA LANE, SANTA FE, NM 87506
JOSEPH R VIGIL	02 RICARDOS COURT, SANTA FE, NM 87506
MATILDE VIGIL	138 COUNTY RD. 84D, SANTA FE, NM 87594