

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

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

**Plaintiff,**

**v.**

**No. 66cv06639 WJ/WPL**

**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**

**FOURTH MOTION TO JOIN PRE-BASIN 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>
ARCHULETA, ADELMO	06A LOMA MANZANITA SANTA FE, NM 87506	AAM-RG-43102
ARCHULETA, ISABEL R.	06A LOMA MANZANITA SANTA FE, NM 87506	AAM-RG-43102
BITTNER, DOUGLAS H.	P.O. BOX 1432 LOS ALAMOS, NM 87544	AAM-RG-12763
BLACK, DAVID L.	1775 E PALM CANYON DR STE 110 PALM SPRINGS, CA 92264	AAM-RG-43179
BLACK, LAWRENCE	1775 E PALM CANYON DR STE 110 PALM SPRINGS, CA 92264	AAM-RG-43179
BREW, SARAH B.	P.O. BOX 1432 LOS ALAMOS, NM 87544	AAM-RG-12763
DRORI, ASSA	138 NORTH ORANGE DRIVE LOS ANGELES, CA 90036	AAM-RG-11668
DRORI, IRENE	138 NORTH ORANGE DRIVE LOS ANGELES, CA 90036	AAM-RG-11668
JOHNSON, CHARLES	1350 SAN REMUNDO BURLINGAME, CA 94010	AAM-RG-64442
KING, JASON	P.O. BOX 1402 LOS ALAMOS, NM 87544	AAM-RG-02188
KING, VIRGINIA	P.O. BOX 1402 LOS ALAMOS, NM 87544	AAM-RG-02188
NOLAND-TRUJILLO, TONI L.	P.O. BOX 6065 SANTA FE, NM 87502	AAM-RG-71289
RATHJEN, JAMES D.	COUNTY ROAD 84 BOX 480C SANTA FE, NM 87506	AAM-RG-60539
RATHJEN, MARY LOU	COUNTY ROAD 84 BOX 480C SANTA FE, NM 87506	AAM-RG-60539
REPUBLICA MUSICANA, INC	425 CAMINO REAL EL PASO, TX 79922	AAM-RG-60536
ROJO, ANA F.	109 FEATHER ROAD SANTA FE, NM 87506	AAM-RG-60538
ROJO, DAMIAN	109 FEATHER ROAD SANTA FE, NM 87506	AAM-RG-60538
ROMEREAU, MARY JANE	27 B EL PUEBLITO ROAD SANTA FE, NM 87506	AAM-RG-10843
TRUJILLO, J. ANTONIO	P.O. BOX 6065 SANTA FE, NM 87502	AAM-RG-71289

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 2<sup>nd</sup> of Sept 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**

ADELMO ARCHULETA	06A LOMA MANZANITA, SANTA FE, NM 87506
ISABEL R. ARCHULETA	06A LOMA MANZANITA, SANTA FE, NM 87506
DOUGLAS H. BITTNER	P.O. BOX 1432, LOS ALAMOS, NM 87544
DAVID L. BLACK	1775 E PALM CANYON DR STE 110, PALM SPRINGS, CA 92264
LAWRENCE BLACK	1775 E PALM CANYON DR STE 110, PALM SPRINGS, CA 92264
SARAH B. BREW	P.O. BOX 1432, LOS ALAMOS, NM 87544
ASSA DRORI	138 NORTH ORANGE DRIVE, LOS ANGELES, CA 90036
IRENE DRORI	138 NORTH ORANGE DRIVE, LOS ANGELES, CA 90036
CHARLES JOHNSON	1350 SAN REMUNDO, BURLINGAME, CA 94010
JASON KING	P.O. BOX 1402, LOS ALAMOS, NM 87544
VIRGINIA KING	P.O. BOX 1402, LOS ALAMOS, NM 87544
TONI L. NOLAND- TRUJILLO	P.O. BOX 6065, SANTA FE, NM 87502
JAMES D. RATHJEN	COUNTY ROAD 84 BOX 480C, SANTA FE, NM 87506
MARY LOU RATHJEN	COUNTY ROAD 84 BOX 480C, SANTA FE, NM 87506
REPUBLICA MUSICANA, INC	ALBERTO AGUILERA, 425 CAMINO REAL, EL PASO, TX 79922
ANA F. ROJO	109 FEATHER ROAD, SANTA FE, NM 87506
DAMIAN ROJO	109 FEATHER ROAD, SANTA FE, NM 87506
MARY JANE ROMEREAU	27 B EL PUEBLITO ROAD, SANTA FE, NM 87506
J. ANTONIO TRUJILLO	P.O. BOX 6065, SANTA FE, NM 87502