

IN THE 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.*,)
))
Defendants.)
))
and)
))
UNITED STATES OF AMERICA)
PUEBLO DE NAMBÉ,)
PUEBLO DE POJOAQUE)
PUEBLO DE SAN ILDEFONSO,)
and PUEBLO DE TESUQUE,)
))
Plaintiffs-in-Intervention)
_____)

CASE NO. 6:66-cv-6639 WJ/WPL

**PUEBLOS' AND UNITED STATES' RESPONSE TO MOTION TO ESTABLISH
PROCEDURES FOR FINAL *INTER SE* PROCEEDING AND ENTRY OF FINAL
JUDGMENT AND DECREE**

The Pueblos of Nambé, Pojoaque, San Ildefonso, and Tesuque (collectively “Pueblos”), and the United States of America file this response in support of the *Motion to Establish Procedures for Final Inter Se Proceedings and Entry of Final Judgment and Decree* (July 21, 2016) (Doc. 10761) (“Motion”).

The procedures proposed in the Motion and accompanying proposed order will provide a full and fair opportunity to all parties to address the remaining *inter se* objections to non-Pueblo water rights. Importantly, the procedures will permit the process to be completed in a timely fashion so that a final judgment and decree can be promptly entered. Finally, the Pueblos and the United States note that while the proposed procedures allow them to pursue certain pending objections and to initiate additional objections, they may do so only if such objections are consistent with the *Settlement Agreement* (Apr. 19, 2012) and relevant prior court orders. *See, e.g.,* Settlement Agreement § 6.1 (*inter se* objections waived among settlement parties); *Order* (Oct. 27, 1983). Any dispute over the limits imposed by those documents should be resolved in the context of specific objections actually filed or pursued by the Pueblos and the United States rather than attempting to define such limits now.

Respectfully submitted on this 8th day of Aug., 2016.

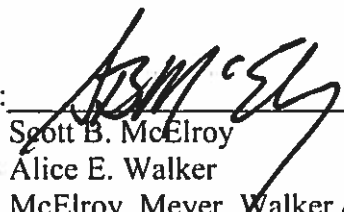
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CERTIFICATE OF SERVICE

I hereby certify that, on August 08, 2016, the **PUEBLOS' AND UNITED STATES' RESPONSE TO MOTION TO ESTABLISH PROCEDURES FOR FINAL *INTER SE* PROCEEDING AND ENTRY OF FINAL JUDGMENT AND DECREE** was filed electronically through the CM/ECF system, which caused CM/ECF Participants to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

I further certify that, on August 08, 2016, copies of the foregoing were mailed by first-class United States mail to the following non-CM/ECF Participants:

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