

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

STATE OF NEW MEXICO,)	
<i>ex rel.</i> State Engineer)	
)	69cv07941- MV/LFG
Plaintiff,)	
)	RIO CHAMA STREAM SYSTEM
vs.)	Section 3, Canjilon Creek
)	
ROMAN ARAGON, <i>et al.</i>)	Subfile No. CHCJ-003-0042
)	
Defendants.)	
_____)	

MOTION FOR SUBSTITUTION OF PARTIES

Plaintiff State of New Mexico, *ex rel.* State Engineer, under Fed. R. Civ. P.25(c), moves the Court to issue its order substituting Kurt Gramoll (“New Defendant”) for Defendants Jeanne A. Jolly and Lloyd B. Jolly in these proceedings, and as grounds Plaintiff states the following:

1. A Consent Order in the name of Jeanne A. Jolly and Lloyd B. Jolly for Subfile No. CHCJ-003-0042 was entered December 26, 2001, (Doc. No. 6460).

2. The New Defendant has purchased the property associated with Subfile No. CHCJ-003-0042, as shown by the Warranty Deed filed with the Rio Arriba County Clerk in Book 509, Page 38 on August 4, 2004.

3. The New Defendant has filed a Change of Ownership of Water Right with the New Mexico Office of the State Engineer on August 20, 2004, for the water rights associated with Subfile No. CHCJ-003-0042.

WHEREFORE, the State of New Mexico requests the Court to enter its order substituting Kurt Gramoll for Defendants Jeanne A. Jolly and Lloyd B. Jolly in these proceedings.

Respectfully submitted,

/s/ Gary B. Storm

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 19, 2013, I filed the foregoing electronically through the CM/ECF system which caused the parties listed 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 via first class mail, postage prepaid addressed as follows:

Kurt Gramoll
1645 Lenden Circle
Bountiful, Utah 84010

Jeanne A. Jolly
Lloyd B. Jolly
P.O. Box 518
Canjilon, New Mexico 87515

/s/ Gary B. Storm
Gary B. Storm