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2 WALKER RIVER IRRIGATION DISTRICT,)
3 a corporation, et al.,)
4 Counterdefendants.)
5)

6 Mineral County hereby files this response to the motions to dismiss filed on February 9,
7 2015, by the Walker River Irrigation District, Circle Bar N Ranch, and the Nevada Department
8 of Wildlife, and joined by Mono County. Subproceeding C-125-B, ECF Nos. 2160, 2161, 2162,
9 2164. To the extent that Mineral County's arguments contained in *Mineral County's Points and*
10 *Authorities in Response to Walker River Irrigation District's Motion to Dismiss or in the*
11 *Alternative to Stay*, filed on May 30, 2014, in Subproceeding C-125-C, which is attached hereto
12 as Exhibit 1, are applicable in Subproceeding C-125-B, Mineral County hereby incorporates
13 them by reference.
14

15 Respectfully submitted this 20th day of March, 2015,

16
17 /s/ Simeon M. Herskovits
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25 /s/ Sean A. Rowe
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Attorneys for Mineral County

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of March, 2015, Mineral County filed, through the United States District Court ECF System the foregoing **MINERAL COUNTY'S RESPONSE TO MOTIONS TO DISMISS CONCERNING THRESHOLD JURISDICTIONAL ISSUES** to be served by CM/ECF electronic filing on all of the registered participants.

/s/ Simeon M. Herskovits

Simeon M. Herskovits