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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA, Plaintiff, WALKER RIVER PAIUTE TRIBE, Plaintiff-Intervenor, vs. WALKER RIVER IRRIGATION DISTRICT, a corporation, et al., Defendants.	IN EQUITY NO. C-125 Sub-file No. C-125-B **IDENTIFICATION OF METHODS USED BY THE UNITED STATES OF AMERICA AND THE WALKER RIVER PAIUTE TRIBE TO IDENTIFY PERSONS AND ENTITIES TO BE SERVED PURSUANT TO PARAGRAPH 3 OF THE CASE MANAGEMENT ORDER**

The following provides an identification of the methods used by the United States of America ("United States") and the Walker River Paiute Tribe ("Tribe") to identify the persons and entities to be served pursuant to Paragraph 3 of the *Case Management Order* (Apr. 18, 2000) ("CMO"), as well as an update on our status in this identification effort. In the status conference of May 30, 2001, the Court directed the United States and the Tribe to provide a list of these methods for comment and

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objections by any other parties prior to a determination by the Court as to whether these methods are reasonable. *Minutes of Court* (May 30, 2001).

In conjunction with this filing, the United States and the Tribe incorporate the following materials filed previously with the Court: *Status Report Submitted By the United States and the Walker River Paiute Tribe in Advance of this Court's Status Conference of October 16, 2000* (Oct. 13, 2000); *Status Report Submitted by the United States of America and the Walker River Paiute Tribe in Advance of this Court's Status Conference of December 21, 2000* (Dec. 19, 2000).

As reported previously to this Court and the parties, the United States has employed litigation support personnel to review and obtain documents, in consultation with the Tribe, in the offices of the U.S. Board of Water Commissioners, the District, the State of Nevada, the State of California, and elsewhere. The *Affidavit of Senior Paralegal, Dennis Becker* (June 12, 2001)("Becker Aff."), Exhibit 1 hereto, details the level of effort we have made and our continued compliance with the Court's CMO. Becker Aff. ¶¶ 6, 12. We have also asked each party to identify and make available information within its respective offices that identifies such persons and entities.[1] It is logical that information relevant to the identification of potential parties would be in the custody or control of the named parties, based on their relationship to and responsibilities for the administration of various water rights. This effort is also ongoing and we expect that the parties will provide us with updated

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[1]*See, e.g., Status Report Submitted By the United States and the Walker River Paiute Tribe in Advance of this Court's Status Conference of October 16, 2000* at 1-2 (Oct. 13, 2000).

information in a timely and accurate manner. We have consulted additional sources within the states, including county recorders' and assessors' offices, as well as other investigatory resources. Our list of sources consulted is set forth initially in Paragraph 13 of Mr. Becker's Affidavit and these sources and related methods of identification are discussed in further detail thereafter on a category by category basis, according to the CMO. Becker Aff. ¶¶ 16 - 23.

We believe that this effort goes well beyond what is reasonable and necessary to satisfy due process. We believe that this effort amply meets the reasonableness test that the Court has decided to apply to this effort, as well as that applied by the Court in its review of Mineral County's similar efforts. *Minutes of the Court* at 2, No. C-125-C (Apr. 1, 1997).

Dated: 6/12/01

Respectfully submitted,

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Dated: 6-18-01

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CERTIFICATE OF MAILING

I hereby certify that on this 19th day of June 2001, I served a true and correct copy of the foregoing "**IDENTIFICATION OF METHODS USED BY THE UNITED STATES OF AMERICA AND THE WALKER RIVER PAIUTE TRIBE TO IDENTIFY PERSONS AND ENTITIES TO BE SERVED PURSUANT TO PARAGRAPH 3 OF THE CASE MANAGEMENT ORDER,**" by first-class mail, postage prepaid, addressed to the following persons:

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