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Environment and Natural Resources Division
United States Department of Justice

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)	IN EQUITY NO. C-125-RCJ
)	Subproceedings: C-125-B
Plaintiff,)	3:73-CV-00127-RCJ-WGC
)	
WALKER RIVER PAIUTE TRIBE,)	
)	
Plaintiff-Intervenor,)	UNITED STATES’ MOTION FOR
vs.)	LEAVE TO FILE EXCESS PAGES
)	
WALKER RIVER IRRIGATION DISTRICT,)	
a corporation, et al.,)	
)	
Defendants.)	
_____)	

The United States of America (“United States”) moves this Court for leave to file a thirty-two page memorandum in response to motions to dismiss. The following grounds are presented in support of this motion.

1. Local rules provide that briefs and points and authorities in response to a motion are limited to thirty pages excluding exhibits. D. Nev. L.R. Part II 7-4.

2. Undersigned counsel has attempted to limit the United States' memorandum to the minimum pages necessary to adequately explain the United States' arguments. The United States is responding, in one memorandum titled "United States' Response to Motions to Dismiss," to three separate motions to dismiss filed by, respectively, the Walker River Irrigation District ("WRID") (ECF No. 1981), the Nevada Department of Wildlife ("NDOW") (ECF No. 1980), and Circle Bar N Ranch, LLC *et al.* ("Circle Bar") (ECF No. 1983) (collectively, "movants"). As explained in the United States memorandum, the motions to dismiss implicate litigation that began in 1902 and the Court's retention of jurisdiction in 1936. In order to fully understand the jurisdictional issues raised by movants, the present proceeding needs to be examined in light of this litigation history. In addition, the motions raise jurisdictional issues that are, of course, of primary importance to the United States and litigation of its claims. Additional pages were necessary to fully explain this background and its effect.

3. As required by Local Rule Part II 7-4, the United States has included a table of contents and a table of authorities in its memorandum.

4. On June 13, 2014, undersigned counsel provided counsel for movants with a draft copy of this motion. Counsel for WRID represented to undersigned counsel that it does not oppose this motion. Undersigned counsel has not received a response from NDOW or Circle Bar.

Respectively submitted, this 17th day of June, 2014.

Sam Hirsch
Acting Assistant Attorney General

/s/ David L. Negri
David L. Negri
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Environment and Natural Resources Division

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IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE

DATED: _____

CERTIFICATE OF SERVICE

It is hereby certified that on the 17th day of June 2014, service of the foregoing **UNITED STATES' MOTION FOR LEAVE TO FILE EXCESS PAGES** was made through the court's electronic filing and notice system (CM/ECF) to all of the registered participants.

/s/ David L. Negri
David L. Negri