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10 *Attorney for Walker River Paiute Tribe*

11  
12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 UNITED STATES OF AMERICA, )  
15 ) IN EQUITY NO. C-125-MDD  
16 Plaintiff, ) Subproceeding:  
 ) 3:73-CV-00127-MDD-WGC  
17 WALKER RIVER PAIUTE TRIBE, )  
18 )  
19 Plaintiff-Intervenors, ) **NOTICE OF THE WALKER**  
 ) **RIVER PAIUTE TRIBE OF**  
20 v. ) **LAY WITNESS AND**  
 ) **REBUTTAL EXPERT**  
21 WALKER RIVER IRRIGATION DISTRICT, ) **WITNESS DISCLOSURES**  
22 a corporation, et al., ) **PURSUANT TO ORDER**  
 ) **REGARDING DISCOVERY**  
23 Defendants. ) **AND MOTION SCHEDULE**  
 ) **AND PROCEDURE**  
24 \_\_\_\_\_ )  
25 )

26 Pursuant to the *Order Regarding Discovery and Motion Schedule and Procedure* (Mar.  
27 16, 2020) (ECF 2611), *as amended, Stipulation and Order Amending Order Regarding*  
28 *Discovery and Motion Schedule* (Dec. 28, 2020) (ECF 2648), the Walker River Paiute Tribe

1 (“Tribe”) files the following statement regarding its lay witness and rebuttal expert witness  
2 disclosures. The Tribe timely files this disclosure statement by April 30, 2021. *Order*  
3 *Regarding Discovery and Motion Schedule and Procedure* ¶¶ 8, 11 (Mar. 16, 2020) (ECF 2611).  
4

5 On October 1, 2019, the Tribe served its initial disclosures in which it identified the lay  
6 witnesses who it will call in this matter. *Notice of Service of the Walker River Paiute Tribe’s*  
7 *Initial Disclosures* (Oct. 1, 2019) (ECF 2587). The Tribe does not disclose any additional lay  
8 witnesses.

9 On September 18, 2020, the Tribe served two expert reports on the parties to this matter:  
10 *Report of Genia Williams* (Sept. 14, 2020); and *Report of Douglas (Denny) Quintero* (Sept. 10,  
11 2020). Since that time, Mr. Quintero has become unable to serve as an expert witness in this  
12 matter due to serious health issues. The Tribe is working diligently to identify a substitute expert  
13 witness to serve in Mr. Quintero’s stead, however, has not yet been able to identify said  
14 substitute. As soon as the Tribe has identified a tribal member who can serve as a substitute  
15 expert witness for Mr. Quintero, it will notify the parties. The Tribe does not disclose any other  
16 rebuttal expert reports.  
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21 Dated: April 30, 2021

Respectfully submitted,

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23 By: /s/ Alice E. Walker  
Alice E. Walker

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*Attorneys for Walker River Paiute Tribe*

**CERTIFICATE OF SERVICE**

It is hereby certified that on April 30, 2021 service of the foregoing was made through the court's electronic filing and notice system (CM/ECF) to all of the registered participants.

Further, pursuant to the *Superseding Order Regarding Service and Filing in Subproceeding C-125-B on and by All Parties* ¶ 20, at 10 (Dec. 17, 2014) (ECF 2100), the foregoing does not affect the rights of others and does not raise significant issues of law or fact. Therefore, the Tribe has taken no step to serve notice of this document via the postcard notice procedures described in paragraph 17.c of the Superseding Order.

By: By: /s/ Alice E. Walker  
Alice E. Walker