TREVA J. HEARNE, ESQ. (SBN 4450)
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Attorneys for Intervenor,
MINERAL COUNTY NEVADA

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UNITED STATES DISTRICT COURT

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-ECR** **Subfile No. C-125-C** **REPLY TO RESPONSE MOTION TO DISMISS AND SUBSTITUTE PROPER PARTIES**
MINERAL COUNTY, Proposed-Plaintiff-Intervenor, vs. WALKER RIVER IRRIGATION DISTRICT, a corporation, et al.	

361

Zeh, Saint-Aubin, Spoo & Hearne
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Comes now, **MINERAL COUNTY, NEVADA,** and replies to the response of the Walker River Irrigation District to the **COUNTY'S** Motion to Dismiss and Substitute Certain Parties.

I.

INTRODUCTION

Mineral County appreciates the comments and responses to its Motion. Had such detailed information been available to Mineral County by all parties possessing such information, this long process might have been less lengthy and certainly less expensive for Mineral County.

II.

REPLY

Adams:

Mineral County accepts the information and will serve Gregory Burton Adams and Richard Taylor Adams.

Alpers:

The deed submitted is the only deed found regarding Alpers. No trust document was found recorded by the Alpers in Lyon County where the property is located. Attached hereto is the documentation showing that Alpers Ranch Co., Inc is no longer a corporation. Fred Alpers and Barbara Alpers hold the property according to the deed of records in Lyon County. Ironically, throughout this case, WRID has stated that its records should not be relied upon for information concerning present record deed holders. Now that the records have been copied and attached, WRID wants to change its position and use its records. If

this is WRID's position, then the Court should order WRID to turn over all of its records immediately for Mineral County to verify the information contested by WRID.

Annett's Mono Village, Inc.:

Has been served by serving Walther, Key, Maupin, Oats, Cox and LeGoy.

Arrache Family Trust:

The trust received all water rights of Juan Arrache.

Fred C. Batchelder and Josephine S. Batchelder/Josephine S. and Fred C.:

All water rights they owned has been transferred to the below referenced Trust.

Fred C. and Josephine S. Batchelder 1983 Family Trust:

Connie B. Jansen has been served.

Albert Bayer/Mildred Bayer:

Mildred Bayer is the sole owner of the water right.

Anna M. Blades and Jerry L. Blades/Richard H. Bein and C. Ellen Bein:

Richard and C. Ellen have been served.

John R. Hargus and Adah M. Blinn Trust/Robert Lewis Cooper, Trustee:

Robert Lewis Cooper has been served as Trustee.

Maurice Bliss and Agnes C. Bliss/ Janet Bliss Hunewill and Stanley L. Hunewill:

Janet Bliss Hunewill and Stanley L. Hunewill have been served.

Bromley Properties:

Mineral County will serve Thomas J. Bromley and Muriel Bromley.

Vernon F. Bryan, Inc./Vernon F. Bryan:

Mineral County has supplied documentation that the Vernon F. Bryan, Inc. corporation has been revoked. Vernon F. Bryan the registered agent, President and owner has been served. WRID's objection is vague unless it refers to the fact that the Caption should continue to read Vernon F. Bryan, Inc. even if it is revoked. Mineral County has no objection to that.

Michael A. Casey and Claudia C. Casey:

The Caseys conveyed their interest in the water rights from the Walker River Irrigation District to William Stone as demonstrated by the recorder of deeds of Lyon County. Then William Stone forfeited his rights to the District. The only party who should be served for the Casey water right is WRID. As WRID has argued many times, the Lyon County records should prevail.

Diane A. Cutler/Walker River Land Corp.:

Walker River Land Corp. has been served.

Charles E. Day and Lucille M. Day/William M. Weaver, Jr. Revocable Trust:

William M. Weaver will be served as Trustee.

Iginia M. Del Porto/Iginia M. Moreda:

Iginia M. Moreda is substituted on the caption.

George O. Fitz/Edward Stockton and Linda A. Stockman:

Edward Stockton and Linda Stockton have been served.

George W. Friedhoff/Helen Friedhoff:

Helen Friedhoff is the sole heir to the water rights.

Don R. Gable Trust/Don R. Gable, individually:

Don Ray Gable will be substituted and has been served.

Virginia M. Giodo/Joseph A. Giodo Revocable Trust:

Virginia M. Giodo will be dismissed from the Caption and Joseph Giodo and Anna Nannini will be substituted as trustees of the Giodo Trust. Anna Nannini has been served.

Harvey E. Hunewill and Phyllis Hunewill/Harvey E. Hunewill and Phyllis P. Hunewill Trust:

Harvey E. Hunewill and Phyllis P. Hunewill have both been served.

Larry Jenkins/Joyce Jenkins:

Larry Jenkins is the sole heir of the water right.

Junction Range/Arnold Settlemeyer and the Bentley Family Limited Partnership:

Arnold Settlemeyer is the registered agent for Settlemeyer Ranches, Inc. and will be served. The registered agent of the Bentley Family Limited Partnership will be served.

LTR Enterprises/Gary D. Morgan, Marianne Morgan, Vincent Dye and Kathleen Dye:

Mineral County will serve Vincent and Kathleen Dye and Lawrence Masini, registered agent for Casino West, Inc.

George Linscott and Louise Linscott/Jean Pace, Administrator:

Jean Pace will be served.

Lucinda Menesini/Donald Menesini:

Donald Menesini is the sole heir to Lucinda Menesini.

Rose Alice Minister/Bolton-Rose Trust:

Bolton Francis Minister will be served as the Trustee to the Minister/Bolton Trust.

Monica R. Moore and Anthony P. Moore/Alfred Palmer and Joy L. Palmer:

William K. Vicencio and Susan Steneri will be served.

Helen Nagel/Diane Nagel:

Diane Nagel has already been served.

Guido Nannini/Anna Nannini:

Anna Nannini has been served.

Robert D. Olson/Curtis & Sons Construction, Inc.:

Attached hereto are the records of the Secretary of State indicating that Brent Curtis is the registered agent for Curtis & Sons Construction, Inc.

Josiah Peeples/Norma Peeples:

Norma Peeples has been served.

Violet Fern Pellegrini/Margaret I. Mench, Ila Mae _____nkhauswer and Cherryl A. Del Porto:

Mineral County will serve Kirk Andrew and Christy Delong Stanton.

Modesta Perriseau/Pamela Haas:

Pamela Haas is the current owner of the Modesta Perriseau water right. Pamela Haas signed a Waiver.

Herbert R. Riva/Anna M. Riva:

Herbert R. Riva has been served.

Sario Livestock Company/Kyle Vaughan and Leona Vaughan:

Sario Livestock Company and the Vaughans will be served.

Jackie Sceirine/Beverly Sceirine:

Mineral County will serve William Todd Sceirine and Michael Duane Sceirine. Beverly Sceirine has already been served.

Gary Silva and Tildean Silva/Sunrise Ranch LLC:

Mineral County has served Sunrise Ranch.

T.F. Snyder:

Mineral County searched the Lyon County records for T.F. Snyder and in all instances found Theresa F. Snyder. She has been served.

William Stone:

WRID has the Stone water right and is already a party in this case.

George Swainston and Dorothy Swainston, individually/Swainston Family Trust:

George D. Swainston, trustee has been served for the George D. Swainston and Dorothy W. Swainston Trust.

Gilbert Wedertz:

Gilbert no longer is listed as a water rights holder. Lyon County records revealed no water rights in the name of Gilbert Wedertz.

Jack H. Williams and Evangeline A. Williams/Williams Revocable Living Trust:

Jack H. Williams and Evangeline A. Williams will be served

Glenora F. Wright/ Lee and Glenora Wright Family Trust:

Glenora and Lee Wright will be served as Trustees of the Trust.

A.J. Zweibel, A.E. Zweibel, Sharon Springer, Sandra Hollands, and Susan Ellsworth/Grade Ranches, Inc.:

Frade Ranches, Inc. has been served through their registered agent. Mineral County can only print what is on the microfiche as best as humanly possible.

DATED this 28th day of September, 2000.

ZEH, SAINT-AUBIN, SPOO & HEARNE

BY: _____
TREVA J. HEARNE, ESQ.
JAMES SPOO, ESQ.

LEVEL 1 OF 1 DOCUMENT

***THIS DATA IS FOR INFORMATION PURPOSES ONLY. CERTIFICATION CAN ONLY BE OBTAINED THROUGH THE OFFICE OF THE NEVADA SECRETARY OF STATE. ***

NEVADA SECRETARY OF STATE, CORPORATE RECORD

NAME: SETTELMEYER RANCHES, INC.

TYPE OF CORPORATION: REGULAR(DOMESTIC PROFIT)

CORPORATE STATUS: IN GOOD STANDING

DURATION: PERPETUAL

DATE OF INCORPORATION/QUALIFICATION: 01/11/1973

STATE-INCORP: NEVADA

REGISTERED AGENT: ARNOLD SETTLEMEYER
STATUS: ACCEPTED 02/22/1989

NUMBER OF COMPANIES REPRESENTED BY REGISTERED AGENT: 1

NUMBER OF COMPANIES REPRESENTED BY ISTERED AGENT: 1

NUMBER OF COMPANIES REPRESENTED BY REGISTERED AGENT IN GOOD STANDING: 1

REGISTERED OFFICE: RT 3 BOX 330
2388 HWY 395 NORTH
MINDEN, NV 89423

PURPOSE: ALL LEGAL ACTIVITIES

CAPITAL/STOCK:
OF NO PAR SHARES: 25,000

ANNUAL-REPORT:
LAST REPORT: ANNUAL LIST OF OFFICERS
LAST REPORT FILED ON: 01/11/2000
ENDING YEAR: 2001

PRESIDENT: ARNOLD SETTELMEYER
2388 HIGHWAY 395
ROUTE 3, BOX 330
MINDEN, NV 89423

MINDEN, NV 89423
STATUS: ADDED 10/22/1976

SECRETARY: PATRICIA SETTELMEYER
2388 HIGHWAY 395
ROUTE 3, BOX 330
MINDEN, NV 89423

STATUS: ADDED 10/22/1976

TREASURER: RICHARD PETERS
P.O. BOX 337
MINDEN, NV 89423

STATUS: ADDED 01/31/1983

CORPORATION NUMBER: 139-1973

CALL LEXIS DOCUMENT SERVICES FOR ALL YOUR CORPORATE NEEDS. 800-634-9738

***THIS DATA IS FOR INFORMATION PURPOSES ONLY. CERTIFICATION CAN ONLY BE OBTAINED THROUGH THE OFFICE OF THE NEVADA SECRETARY OF STATE. ***

NEVADA SECRETARY OF STATE, LIMITED PARTNERSHIP RECORD

NAME: BENTLEY LIMITED PARTNERSHIP, A NEVADA LIMITED PARTNERSHIP

TYPE OF PARTNERSHIP: LIMITED PARTNERSHIP (DOMESTIC)

PARTNERSHIP STATUS: PARTNERSHIP - CANCELLED 01/10/1994

STATUS-COMMENT:
PRE_CANCELLATION STATUS: CURRENT LIST

DURATION: 50 YEARS
EXPIRES: 12/10/2040

DATE PARTNERSHIP FORMED: 12/10/1990

MAILING ADDRESS: BENTLEY LIMITED PARTNERSHIP, A NEVA
SUITE

MAILING ADDRESS: BENTLEY LIMITED PARTNERSHIP, A NEVA
SUITE
1175 FAIRVIEW DR.
CARSON CITY, NV 89701

STATE OF ORIGIN: NEVADA

REGISTERED AGENT: SCOTT J HEATON
STATUS: ACCEPTED 12/11/1990

516

234

REGISTERED OFFICE: #102
3064 SILVER SAGE DR.
CARSON CITY, NV 89701

PURPOSE: ALL LEGAL ACTIVITIES

ANNUAL-REPORT:
LAST REPORT: ANNUAL LIST OF OFFICERS

ANNUAL-REPORT:
LAST REPORT: ANNUAL LIST OF OFFICERS
LAST REPORT FILED ON: 01/22/1993
ENDING YEAR: 1993

GENERAL PARTNER(S): WILLIAM KONG DOO WONG
14342 PAMLICO RD.
APPLE VALLEY, CA 92307

STATUS: ADDED 12/10/1990

STATUS: ADDED 12/10/1990

PARTNERSHIP NUMBER: LP703-1990

CALL LEXIS DOCUMENT SERVICES FOR ALL YOUR CORPORATE NEEDS. 800-634-9738

LEVEL 1 - OF 129 DOCUMENTS

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NEVADA SECRETARY OF STATE, LIMITED PARTNERSHIP RECORD

NAME: BENTLEY WEST (A LIMITED PARTNERSHIP)

TYPE OF PARTNERSHIP: LIMITED PARTNERSHIP (DOMESTIC)

PARTNERSHIP STATUS: DELINQUENT 07/01/2000

DURATION: PERPETUAL

DATE PARTNERSHIP FORMED: 06/10/1999

MAILING ADDRESS: 2533 N CARSON ST
CARSON CITY, NV 89706

STATE OF ORIGIN: NEVADA

REGISTERED AGENT: LAUGHLIN ASSOCIATES, INC.

REGISTERED AGENT: LAUGHLIN ASSOCIAT INC.
STATUS: ACCEPTED 06/10/1999

14,651

6,604

REGISTERED OFFICE: 2533 N. CARSON STREET
CARSON CITY, NV 89706

PURPOSE: ALL LEGAL ACTIVITIES
PICKUP BIN 2CC

ANNUAL-REPORT:
LAST REPORT: ANNUAL LIST OF OFFICERS
LAST REPORT FILED ON: 06/10/1999
ENDING YEAR: 2000

GENERAL PARTNER(S): CURTIS ROSE
2533 N CARSON ST
CARSON CITY, NV 89706

END DOCUMENT of Level 1 printed in FULL format.

***THIS DATA IS FOR INFORMATION PURPOSES ONLY. CERTIFICATION CAN ONLY BE OBTAINED THROUGH THE OFFICE OF THE NEVADA SECRETARY OF STATE. ***

NEVADA SECRETARY OF STATE, CORPORATE RECORD

NAME: CASINO WEST, INC.

TYPE OF CORPORATION: REGULAR(DOMESTIC PROFIT)

CORPORATE STATUS: IN GOOD STANDING

DURATION: PERPETUAL

DATE OF INCORPORATION/QUALIFICATION: 05/29/1979

STATE-INCORP: NEVADA

REGISTERED AGENT: LAWRENCE B. MASINI
STATUS: ACCEPTED 08/28/1979

NUMBER OF COMPANIES REPRESENTED BY REGISTERED AGENT: 2

NUMBER OF COMPANIES REPRESENTED BY REGISTERED AGENT IN GOOD STANDING: 2

REGISTERED OFFICE: 11 NORTH MAIN STREET
YERINGTON, NV 89447

PURPOSE: ALL LEGAL ACTIVITIES
HAS GAMING

CAPITAL/STOCK:
CAPITAL: $500,000
PAR SHARES: 50,000
PAR VALUE: $10.000

ANNUAL-REPORT:
LAST REPORT: ANNUAL LIST OF OFFICERS
LAST REPORT FILED ON: 04/07/2000
ENDING YEAR: 2001

PRESIDENT: L. BRYAN MASINI
11 NORTH MAIN STREET
YERINGTON, NV 89447

STATUS: ADDED 03/28/1983

SECRETARY: PATRICIA K. MASINI
11 NORTH MAIN STREET
YERINGTON, NV 89447

STATUS: ADDED 03/28/1983

TREASURER: PATRICIA K. MASINI
11 NORTH MAIN STREET
YERINGTON, NV 89447

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NEVADA SECRETARY OF STATE, CORPORATE RECORD

NAME: CURTIS & SONS CONSTRUCTION, INC.

TYPE OF CORPORATION: REGULAR(DOMESTIC PROFIT)

CORPORATE STATUS: IN GOOD STANDING

STATUS-COMMENT:
LIABILITY STATUS: HAS LIMITED LIABILITY

DURATION: PERPETUAL

DATE OF INCORPORATION/QUALIFICATION: 03/24/1993

STATE-INCORP: NEVADA

REGISTERED AGENT: BRENT E. CURTIS

REGISTERED AGENT: BRENT E. CURTIS
STATUS: ACCEPTED 03/16/1994

NUMBER OF COMPANIES REPRESENTED BY REGISTERED AGENT: 1

NUMBER OF COMPANIES REPRESENTED BY REGISTERED AGENT IN GOOD STANDING: 1

REGISTERED OFFICE: P.O. BOX 2911
1201 S. ORCHARD ROAD
GARDNERVILLE, NV 89423

PURPOSE: ALL LEGAL ACTIVITIES

CAPITAL/STOCK:
OF NO PAR SHARES: 25,000

ANNUAL-REPORT:
LAST REPORT: ANNUAL LIST OF OFFICERS
LAST REPORT FILED ON: 03/02/2000
ENDING YEAR: 2001
MORE OFFICERS ON LIST

PRESIDENT: BRENT E. CURTIS
BOX 2911, MINDEN
1201 S. ORCHARD RD.
GARDNVERVILLE, NV 89410

STATUS: ADDED 04/09/1993

SECRETARY: TANYA STREETER
BOX 2911, MINDEN
1201 S. ORCHARD RD.
GARDNVERVILLE, NV 89410

STATUS: ADDED 04/09/1993

TREASURER: JEANNE C. CURTIS
BOX 2911, MINDEN
1201 S. ORCHARD RD.
GARDNVERVILLE, NV 89410

STATUS: ADDED 04/09/1993

INCORPORATORS: TERZICH, HERBIG & JACKSON, LTD.
P.O. BOX 1210