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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, v. WALKER RIVER IRRIGATION DISTRICT, a corporation, et al., Defendants. _____ MINERAL COUNTY, Proposed Plaintiff-Intervenor, v. WALKER RIVER IRRIGATION DISTRICT, et al., Proposed Defendants. _____	IN EQUITY NO. C-125-RCJ SUBFILE NO. C-125-C 3:73-CV-00128-RCJ-WGC **WALKER RIVER IRRIGATION DISTRICT'S NOTICE OF OBJECTIONS TO PROPOSED SUMMARY OF PROCEEDINGS OF THE STATUS CONFERENCE CONDUCTED ON AUGUST 22, 2012**

The Walker River Irrigation District (the "District") objects to the Proposed Summary of Proceedings of the Status Conference conducted on August 22, 2012 (the "Proposed Summary"). Doc. 603. The District objects to the paragraph on page 7 of the Proposed Summary, which is in bold face type. During the Status Conference, the Court requested that the United States include in the Proposed Summary information from previously entered orders which identify the categories of water right holders who were to be defendants in Subproceeding C-125-B and in Subproceeding C-125-C. The clear purpose of the request was to aid the Court in understanding the categories of defendants in the two subproceedings, and the differences between the two. The Court requested a reference to the prior orders which identified the categories of defendants in each case.

Although counsel for the District considered it unusual to include that information in what was to be a summary of the Status Conference itself, counsel did not suggest a different alternative because the Court's request could be satisfied easily by references to and quotes from the relevant orders. The United States, Mineral County and the Walker Lake Working Group apparently collaborated on what to include in the Proposed Summary. *See* Doc. 603 at 6.

The District has two objections to the paragraph in bold face type on page 7. First, the information provided therein was not called for or requested by the Court. If the Court had requested information on how persons and entities within the categories of defendants were identified, and whether there was consensus among all parties as to the content of a list of persons and entities identified, then that information would have been required not just for subproceeding C-125-C, but also for subproceeding C-125-B. Moreover, given the multi-decade history of these two subproceedings, the Court would not have expected such information to be provided in a Proposed Summary of a Status Conference which was intended

to be prepared by just one party. Second, because the information provided is incomplete, it is not accurate.

If the Court desires a complete summary of what occurred before the Order entered October 24, 1997 (C-Doc. 156), and what occurred after the entry of the May 13, 1998 Order (C-Doc. 196) with respect to the list of persons and entities to be served in subproceeding C-125-C, the District will take the time and expend the resources necessary to prepare and provide that information to the Court. However, counsel for the District does not believe that that information is necessary at this time, and, in fact, it may never be necessary.

Dated: August 31, 2012

WOODBURN AND WEDGE

By: / s / Gordon H. DePaoli

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CERTIFICATE OF SERVICE

I certify that I am an employee of Woodburn and Wedge and that on the 31st day of August, 2012, I electronically served the foregoing *Walker River Irrigation District's Notice of Objections to Proposed Summary of Proceedings of the Status Conference Conducted on August 22, 2012* with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following via their email addresses:

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