

IGNACIA S. MORENO
Assistant Attorney General
Greg Addington, Assistant U.S. Attorney

Susan L. Schneider, Trial Attorney
Andrew "Guss" Guarino, Trial Attorney
U.S. Department of Justice
Environment and Natural Resources Div.
999 18th Street, Suite 370
Denver, Colorado 80202
(303) 844-1348; (303) 844-1343
susan.schneider@usdoj.gov
guss.guarino@usdoj.gov

David L. Negri, Trial Attorney
Environment and Natural Resources Div.
c/o U.S. Attorney's Office
800 Park Blvd., # 600
Boise, Idaho 83712
(208) 334-1936
David.Negri@usdoj.gov

Attorneys for the United States of America

**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.)

MINERAL COUNTY,)
)
Proposed-Plaintiff-Intervenor,)

vs.)

WALKER RIVER IRRIGATION DISTRICT,)
a corporation, et al.)
Proposed Defendants.)

) IN EQUITY NO. C-125-RCJ
) Subproceeding: C-125-C
) 3:73-CV-00128-RCJ-WGC
)

) **UNITED STATES OF AMERICA'S**
) **RESPONSE TO MINERAL COUNTY'S**
) **MOTION TO INTERVENE**
)

The United States of America respectfully takes no position regarding Mineral County's Motion to Intervene.¹

Dated: December 14, 2012

Respectfully submitted,

IGNACIA S. MORENO
Assistant Attorney General

Greg Addington, Assistant United States Attorney
Susan L. Schneider, Trial Attorney
Guss Guarino, Trial Attorney
David L. Negri, Trial Attorney
U.S. Department of Justice
Environmental and Natural Resources Div.
999 – 18th Street, Suite 370
Denver, Colorado 80202
(303) 844-1348
susan.schneider@usdoj.gov
(303) 844-1343
guss.guarino@usdoj.gov

By /s/ Susan L. Schneider
SUSAN L. SCHNEIDER

Attorneys for the United States of America

OF COUNSEL
FOR THE UNITED STATES:
Chris Watson, Attorney-Advisor
U.S. Department of the Interior
Office of the Solicitor
Division of Indian Affairs
Mail Stop 6513
1849 C St., NW
Washington, DC 20240
(202) 208-3401

¹ Further, although some parties appear to address the underlying merits of Mineral County's claim, the United States understands that the merits of Mineral County's claim will be addressed at a later date in the event that the Court grants the county's motion to intervene.

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of December, 2012, I electronically filed the foregoing **UNITED STATES OF AMERICA'S RESPONSE TO MINERAL COUNTY'S MOTION TO INTERVENE** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses that are registered for this case;

and I further certify that I served a copy of the forgoing to the following non CM/ECF participants by U.S. Mail, postage prepaid, this 14th day of December, 2012:

Athena Brown, Superintendent
Western Nevada Agency
Bureau of Indian Affairs
311 E. Washington Street
Carson City, NV 89701-4065

William J. Shaw
Brooke & Shaw, Ltd
P.O. Box 2860
Minden, NV 89423

Allen Biaggi/Leo Drozdoff
Dept. of Conservation & Natural Res.
State of Nevada
901 S. Stewart St.
Suite 1003
Carson City, NV 89701

George M. Keele
1692 County Road, Ste. A
Minden, NV 89423

State Engineer - Division of Water
Resources
State of Nevada
901 S. Stewart St., Suite 202
Carson City, NV 89701

Arthur B. Walsh
Los Angeles City Attorney's Office
PO Box 51-111
111 North Hope Street, Suite 340
Los Angeles, CA 90054

/s/ Eileen Rutherford
Senior Paralegal, USIS for
United States Department of Justice