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14 IN THE UNITED STATES DISTRICT COURT  
15 FOR THE DISTRICT OF NEVADA

16	UNITED STATES OF AMERICA,	)	3:73-cv-00128-MMD-WGC
17	Plaintiff,	)	
18	WALKER RIVER PAIUTE TRIBE,	)	
19	Plaintiff-Intervenor,	)	<b>PRINCIPAL DEFENDANTS' JOINT</b>
20	v.	)	<b>MOTION TO DISMISS MINERAL</b>
21	WALKER RIVER IRRIGATION DISTRICT,	)	<b>COUNTY'S SECOND AMENDED</b>
22	a corporation, et al.,	)	<b>COMPLAINT IN INTERVENTION</b>
23	Defendants.	)	<b>PURSUANT TO FED. R. CIV. P.</b>
24		)	<b>12(b)(1), 12(B)(6) and 12(b)(7)</b>
25	_____	)	<b>ORAL ARGUMENT REQUESTED</b>
26	MINERAL COUNTY,	)	
27	Plaintiff-Intervenor,	)	
28	v.	)	
	WALKER RIVER IRRIGATION DISTRICT,	)	
	et al.,	)	
	Defendants.	)	
	_____	)	

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35 *Peri & Peri, LLC, and Frade Ranches, Inc.*

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1 The Principal Defendants'<sup>1</sup> move the Court for an order dismissing Mineral County's  
2 Second Amended Complaint in Intervention as follows:

3 (1) Pursuant to Fed. R. Civ. P. 12(b)(1) on the ground that the Court lacks subject  
4 matter jurisdiction;

5 (2) Pursuant to Fed. R. Civ. P. 12(b)(7) on the ground that it fails to join a necessary  
6 party under Fed R. Civ. P. 19; and

7 (3) Pursuant to Fed. R. Civ. P. 12(b)(6) on the ground that it fails to state a claim  
8 upon which relief can be granted.

9  
10 This motion is made and based upon all of the pleadings and papers on file herein and the  
11 Points and Authorities which are filed herewith under separate cover.

12 Date: October 28, 2021

WOODBURN AND WEDGE  
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13  
14  
15 By: /s/ Gordon H. DePaoli  
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18  
19 Date: October 28, 2021

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20 By: /s/ Anthony Walsh (per authorization)  
Anthony Walsh, NSB# 14128  
21 *Attorneys for Nevada Department of Wildlife*

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26 <sup>1</sup> Here the "Principal Defendants" are the Walker River Irrigation District, Desert Pearl  
27 Farms, LLC, Peri Family Ranch, LLC, Peri & Peri, LLC, and Frade Ranches, Inc., Lyon  
28 County and Centennial Livestock, the Nevada Department of Wildlife, the Schroeder Group,  
and Mono County.

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Date: October 28, 2021

BEST BEST & KRIEGER LLP

By: /s/ Roderick E. Walston (per authorization)  
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Date: October 28, 2021

THE COUNTY OF MONO (CA)

By: /s/ Stacey Simon (per authorization)  
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Date: October 28, 2021

SIMONS HALL JOHNSTON PC

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Date: October 28, 2021

SCHROEDER LAW OFFICES, P.C.

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