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**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, )  
)  
Plaintiff-Intervenor, )

vs. )

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

IN EQUITY NO. C-125-MMD  
Subproceeding: 3:73-CV-00128-MMD-CSD

**JOINT MOTION FOR  
RECONSIDERATION OF APRIL 22,  
2022, MINUTE ORDER DENYING  
STIPULATION CONCERNING  
BRIEFING DEADLINES ON  
PRINCIPAL DEFENDANTS' MOTION  
TO DISMISS**

1 COME NOW, Plaintiff-Intervenor Mineral County, Nevada, and Principal Defendants  
2 Walker River Irrigation District, Lyon County, Centennial Livestock, the Schroeder Group,  
3 Nevada Department of Wildlife, Mono County, California, Desert Pearl Farms, Peri Family  
4 Ranch, LLC, Peri & Peri LLC, and Frade Ranches (“the Parties”), by and through undersigned  
5 counsel, and hereby move the Court to reconsider its April 22, 2022, *Minute Order*, which  
6 denied the Parties’ April 20, 2022, stipulated request to adjust the briefing schedule on Principal  
7 Defendants’ October 28, 2021, *Joint Motion to Dismiss Mineral County’s Second Amended*  
8 *Complaint in Intervention Pursuant to Fed. R. Civ. P. 12(B)(1), 12(B)(6) and 12(B)(7)* (“*Motion*  
9 *to Dismiss*”). *Minute Order* (April 22, 2022) (ECF 1047); *see also Stipulation and [Proposed]*  
10 *Order Concerning Briefing Deadlines on Principal Defendants’ Motion to Dismiss Mineral*  
11 *County’s Second Amended Complaint in Intervention* (April 20, 2022) (ECF 1045)  
12 (“*Stipulation*”); *Motion to Dismiss* (ECF 994, 996).

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14  
15 The Parties’ April 20, 2022, *Stipulation* contained a request to adjust the response  
16 deadlines related to Principal Defendants’ October 28, 2021, *Motion to Dismiss* as follows:

- 17 1. Mineral County’s response to Principal Defendants’ *Motion to Dismiss* would be  
18 due by May 31, 2022. *Stipulation* at 4.
- 19 2. Principal Defendants’ joint reply in support of said joint *Motion to Dismiss* would  
20 be due by August 1, 2022. *Id.* at 5.

21  
22 The Court’s April 22, 2022, *Minute Order* denied the *Stipulation*, “because the requested  
23 extension would result in the reply brief being submitted to the Court by the end of September  
24 2022.” ECF 1047. The *Minute Order* further provided that “the Court will grant a brief  
25 extension so long as the joint reply brief is filed by the end of August 2022 to give the Court  
26 sufficient time to resolve the dispositive motions by the end of September 2022.” *Id.*

1           Because the *Stipulation* already provides that Principal Defendants' reply brief would be  
2 due by August 1, 2022, *see Stipulation* at 5, it already conforms to the time frame set by the  
3 Court's April 22, 2022, *Minute Order*. Accordingly, the Parties respectfully request that the  
4 Court reconsider its denial of the *Stipulation* and grant the same.

5           Respectfully submitted,

6  
7 Date: April 25, 2022                   ADVOCATES FOR COMMUNITY & ENVIRONMENT  
8   P.O. Box 1075  
9   El Prado, New Mexico 87529

10   By: /s/ Iris Thornton  
  Iris Thornton, *pro hac vice*  
  Attorney for Mineral County

11 Date: April 25, 2022                   WOODBURN AND WEDGE  
12   6100 Neil Road, Suite 500  
13   Reno, Nevada 89511

14   By: /s/ (per authorization)  
  Gordon H. DePaoli, NSB # 195  
  Attorneys for Walker River Irrigation District

15  
16 Date: April 25, 2022                   BEST BEST & KRIEGER  
17   2001 N. Main Street, Suite 390  
18   Walnut Creek, California 94596  
19   Jerry Snyder, NSB # 6830

20   By: /s/ (per authorization)  
  Roderick E. Walston  
  Attorney for Lyon County and Centennial Livestock

21 Date: April 25, 2022                   SCHROEDER LAW OFFICES, P.C.  
22   10615 Double R. Blvd. #100  
23   Reno, NV 89521

24   By: /s/ (per authorization)  
  Therese Ure Stix, NSB # 10255  
  Attorney for The Schroeder Group

1 Date: April 25, 2022

STATE OF NEVADA OFFICE OF THE  
ATTORNEY GENERAL  
100 N. Carson Street  
Carson City, Nevada 89701-4717

2  
3  
4 By: /s/ (per authorization)  
Anthony J. Walsh, NSB # 14128  
Attorney for Nevada Department of Wildlife

5  
6 Date: April 25, 2022

THE COUNTY OF MONO, CALIFORNIA  
P.O. Box 2415A  
Mammoth Lakes, California 93546-2415

7  
8 By: /s/ (per authorization)  
Stacey Simon, County Counsel  
Emily Fox, Dep. County Counsel  
Attorneys for Mono County, California

9  
10  
11 Date: April 25, 2022

SIMONS HALL JOHNSTON PC  
22 State Route 208  
Yerington, Nevada 89447

12  
13 By: /s/ (per authorization)  
Brad M. Johnston, NSB # 8515  
Attorney for Desert Pearl Farms, Peri Family  
Ranch, LLC, Peri & Peri LLC, and Frade Ranches

14  
15  
16 **ORDER**

17  
18 Dated: \_\_\_\_\_, 2022. IT IS SO ORDERED.

19  
20  
21 \_\_\_\_\_  
Miranda M. Du  
United States District Judge

**CERTIFICATE OF SERVICE**

1  
2 I hereby certify that on this 25th day of April, 2022, I electronically filed the foregoing  
3 **JOINT MOTION FOR RECONSIDERATION OF APRIL 22, 2022, MINUTE ORDER**  
4 **DENYING STIPULATION CONCERNING BRIEFING DEADLINES ON PRINCIPAL**  
5 **DEFENDANTS' MOTION TO DISMISS** with the Clerk of the Court using the CM/ECF  
6 system, which will send notification of such filing to the email addresses that are registered for  
7 this case.  
8

9 Additionally, I hereby certify that on this 25th day of April, 2022, I caused to be served,  
10 via United States Postal Service First Class Mail, a complete copy of the foregoing **JOINT**  
11 **MOTION FOR RECONSIDERATION OF APRIL 22, 2022, MINUTE ORDER**  
12 **DENYING STIPULATION CONCERNING BRIEFING DEADLINES ON PRINCIPAL**  
13 **DEFENDANTS' MOTION TO DISMISS**, on the following Defendant who has been granted  
14 mailed service by the Court:  
15

16 Joe and David Sceirine Ranches  
17 P.O. Box 1013  
18 Yerington, NV 89447  
19  
20  
21

22 /s/Iris Thornton  
23 Iris Thornton  
24  
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26  
27  
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