

1 De CUIR & SOMACH  
A Professional Corporation  
2 STUART L. SOMACH (Cal. Bar # 090959; Pro Hac Vice)  
JOHN A. MENDEZ (Cal. Bar # 095450; Pro Hac Vice)  
3 WILLIAM E. HVIDSTEN (Cal. Bar # 113030; Pro Hac Vice)  
A Professional Corporation  
4 400 Capitol Mall, Suite 1900  
Sacramento, California 95814  
5 Telephone: (916) 446-7979

FILED  
00 APR -4 PM 3:22  
LANCE S. WILSON  
CLERK  
BY \_\_\_\_\_  
F. FURY

6 HALE, LANE, PEEK, DENNISON, HOWARD  
ANDERSON AND PEARL  
7 ALEX J. FLANGAS  
TIMOTHY A. LUKAS  
8 ROBERT C. ANDERSON  
100 W. Liberty Street, Tenth Floor  
9 P.O. Box 3237  
Reno, Nevada 89505  
10 Telephone: (775) 786-7900

11 Attorneys for Walker River Basin  
Water Users Association. and  
12 Certain Individual Members

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

16 UNITED STATES OF AMERICA, )  
 )  
17 Plaintiff, )  
 )  
18 WALKER RIVER PAIUTE TRIBE, )  
 )  
19 Plaintiff-Intervenor, )  
 )  
20 v. )  
 )  
21 WALKER RIVER IRRIGATION DISTRICT, )  
a corporation, et al., )  
22 )  
 )  
23 Defendants. )

Case No. C-125-ECR  
Subfile No. C-125-C  
MOTION TO WITHDRAW AS  
COUNSEL; AFFIDAVIT OF  
WILLIAM E. HVIDSTEN

24  
25  
26 COMES NOW, William E. Hvidsten, Esq., of the law firm of De Cuir & Somach, and  
27 Timothy A. Lukas, Esq., of the law firm of Hale, Lane, Peek, Dennison, Howard, Anderson and  
28 Pearl, counsel of record for certain members of the former Walker River Basin Water Users

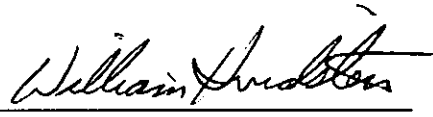
1 Association, and moves this Court, pursuant to L.R. IA 10-6 for an Order Allowing the  
2 Withdrawal of Counsel for those members.

3 This Motion is based upon the fact that the Walker River Basin Water Users Association  
4 has disbanded, and no new entity has taken its place to provide legal representation to its  
5 members. The individual members have not retained De Cuir & Somach or Hale, Lane, Peek,  
6 Dennison, Howard, Anderson ~~and Peart~~ for representation in this matter, and the matter  
7 continues to move forward. This Motion is supported by the Affidavit of William E. Hvidsten.

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Dated this 9<sup>th</sup> day of March, 2000.

DE CUIR & SOMACH  
A Professional Corporation

By:   
WILLIAM E. HVIDSTEN  
Attorney for Defendant

Dated this 14<sup>th</sup> day of March, 2000.

HALE, LANE, PEEK, DENNISON,  
HOWARD, ANDERSON ~~and PEART~~

By:   
Attorneys for Defendant

1 STATE OF CALIFORNIA )  
2 COUNTY OF SACRAMENTO ) ss.

3  
4 **AFFIDAVIT OF WILLIAM E. HVIDSTEN**

5 William E. Hvidsten, Esq., being first duly sworn, deposes and says as follows:

6 1. I am an attorney licensed by the State of California to practice before all courts of  
7 that State. I am admitted pro hac vice to this court as of March 26, 1998.

8 2. The firm of De Cuir & Somach was retained by the Walker River Basin Water  
9 Users Association (Association) to represent the individual members of the Association in this  
10 action and has made appearances on behalf of certain members. Pursuant to L.R. IA 10-2,  
11 De Cuir & Somach associated as co-counsel the firm of Hale, Lane, Peek, Dennison, Howard,  
12 Anderson and Pearl, as its resident member of a bar of this Court.

13 3. The Association has disbanded and no new entity has taken its place to provide  
14 legal representation to its members. The individual members represented in this action by the  
15 firms of De Cuir & Somach, and Hale, Lane, Peek, Dennison, Howard, Anderson and Pearl were  
16 all members of the former Association, and were represented solely in that capacity.

17 4. The individual members were notified in January 1999 that they were no longer  
18 represented as a group in this matter, and individual representation was offered. Copies of the  
19 letters sent to the members are attached hereto as Exhibit A.

20 5. Jeff Hunewill, a director of the former Association, and now Chairman of the  
21 Bridgeport Rancher's Organization (BRO) to which many former Association members also  
22 belong, selected alternate counsel for representation in this matter. Mr. Hunewill has sent a letter  
23 to BRO members informing them of the new counsel's willingness to represent the group and  
24 the necessity of releasing De Cuir & Somach from representation. A copy of that letter is  
25 attached hereto as Exhibit B.

26 6. I recently received Substitutions of Attorneys for counsel to replace De Cuir &  
27 Somach and of Hale, Lane, Peek, Dennison, Howard, Anderson and Pearl in this matter. Those  
28 parties submitting the Substitutions of Attorneys are Sario Livestock Company, Ronald Arrache

1 and Carolyn Strosnider. The substitutions will be submitted to this Court when they are fully  
2 signed. To my knowledge, the remainder of the parties have not committed to representation.  
3 Those who I believe have not committed to representation are listed in Exhibit C.

4 7. I have knowledge of and am competent to testify to the matters stated herein, except  
5 to those matters stated on information and belief, and as to those matters I believe them to be  
6 true.

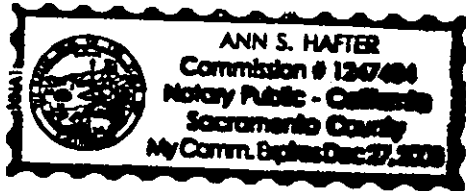
7 I, William E. Hvidsten, do hereby swear under penalty of perjury that the foregoing  
8 assertions are true.

9  
10 Dated this 9<sup>th</sup> day of March, 2000.

11  
12   
13 WILLIAM E. HVIDSTEN

14  
15 State of California )  
16 County of Sacramento ) ss.

17 On March 9<sup>th</sup>, 2000, before me, Ann S. Hafter, personally appeared William E. Hvidsten  
18 proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to  
19 the within instrument and acknowledged to me that he executed the same in his authorized  
20 capacity, and that by his signature on the instrument the person, or the entity upon behalf of  
21 which the person acted, executed the instrument.



22 WITNESS my hand and official seal

23   
24 Ann S. Hafter, Notary Public

25 Place Notary Seal Above

1 PROOF OF SERVICE (Federal)

2 COURT: United States District Court - District of Nevada  
3 CASE NAME: United States of America, Plaintiff, Walker River Paiute Tribe,  
4 Plaintiff-Intervenor, v. Walker River Irrigation District, et al.  
5 CASE NO.: C-125-ECR - Subfile No. C-125-C

6 I am a citizen of the United States, employed in the City and County of Sacramento. My  
7 business address is 400 Capitol Mall, Suite 1900, Sacramento, CA 95814. I am over the age of  
8 18 years and not a party to the foregoing action.

9 On <sup>April</sup> ~~March~~ 4, 2000, I served the following:

10 **MOTION TO WITHDRAW AS COUNSEL; AFFIDAVIT OF WILLIAM E.**  
11 **HVIDSTEN**

12  (by mail) on all parties in said action, by placing a true copy thereof enclosed in a sealed  
13 envelope in a designated area for outgoing mail, addressed as set forth on the attached service  
14 list. At De Cuir & Somach, mail placed in that designated area is given the correct amount of  
15 postage and is deposited that same day, in the ordinary course of business, in a United States  
16 mailbox in the City of Sacramento, California.

17  (by personal delivery) by personally delivering a true copy thereof to the person and at the  
18 address as set forth on the attached service list.

19  (by overnight delivery service) via Federal Express addressed to the person at the address  
20 as set forth on the attached service list.

21  (by facsimile transmission) to the person at the address and phone number as set forth on  
22 the attached service list.

23 Please See Attached Service List

24 <sup>April</sup> I declare under penalty of perjury that the foregoing is true and correct. Executed on  
25 ~~March~~ 4, 2000, at Sacramento, California.

26   
27 Marlene Martin  
28

1 Stan Hunewill  
Hunewill Ranch  
2 P. O. Box 368  
Bridgeport, CA 93517

3 Norman Annett  
Annett's Mono Village  
4 Post Office Box 455  
5 Bridgeport, CA 93517

6 Ron Arrache  
P. O. Box 2468  
Lancaster, CA 93539

7 Artesani Family Trust  
8 c/o E.J. and M.E. Artesani  
3024 Hauser Way  
9 Carson City, NV 89701

10 Richard N. Fulstone  
2022 Nevada State Highway, No. 208  
11 P. O. Box 61  
Smith, NV 89430

12 Deborah Hartline  
P. O. Box 1343  
13 Quincy, CA 95971

14 Terry Hawkins  
Margaret Hawkins  
945 E. Main Street, #168  
15 Fernley, NV 89801

16 Virginia Lakes Mutual Water Company  
c/o Don Meier  
17 4495 Gibraltar Drive  
Reno, NV 89509

18 David Parraguire  
19 1700 Wendy Way  
Reno, NV 89509

20 Plymouth Land and Stock  
c/o Louis W. Bergevin  
21 P. O. Box 188  
22 Gardnerville, NV 89410

23 Sario Livestock Co.  
c/o Beatrice Presto  
1462 Douglas Avenue  
24 Gardnerville, NV 89410

25 David A. Sceirine  
P. O. Box 1013  
26 Yerington, NV 89447

27 Joe Sceirine  
P. O. Box 1013  
28 Yerington, NV 89447

Jack Sceirine  
Beverly Sceirine  
P. O. Box 249  
Yerington, NV 89447

Kenneth Strosnider  
Carol Strosnider  
P. O. Box 26  
Smith, NV 89430

Talbot Land & Livestock  
c/o Thomas J. Talbot  
1650 North Sierra Highway  
Bishop, CA 93514

Rachel Tholke Trust  
c/o Dawn Cooper, Trustee  
P. O. Box 97  
Coleville, CA 96107

Twelves Family Trust  
c/o Roy Snyder and Joanne Rice  
Elizabeth Aadnesen  
4164 South Syracuse  
Denver, CO 80237

Sweetwater Ranch  
c/o William W. Weaver, Jr.  
2535 State Route 338  
Wellington, NV 89444



DE CUIR & SOMACH

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

400 CAPITOL MALL

SUITE 1900

SACRAMENTO, CA 95814-4407

TELEPHONE (916) 448-7979

FACSIMILE (916) 448-8199

January 6, 1999

WILLIAM E. HVIDSTEN

Ron Arrache  
Post Office Box 2468  
Lancaster, CA 93539

Re: Walker River Basin Water Users Association  
Mineral County Litigation

Dear Mr. Arrache:

This letter is to inform you that the Walker River Basin Water Users Association ("WUA") Board of Directors recently voted to dissolve the organization. That dissolution results in the termination of DeCuir & Somach's legal services agreement with WUA. Under that agreement, WUA was to pay for all legal services provided to you by virtue of your membership in WUA and pursuant to a legal services agreement between you and DeCuir & Somach. As a result of the foregoing, DeCuir & Somach, regrettably, must terminate its existing legal services agreement with you.

Because you are a named party in the litigation and your water rights are subject to challenge by Mineral County and the Walker River Paiute Indian Tribe, it is very important that you retain new counsel as quickly as possible. Presently, the Court is still dealing with whether Mineral County has properly served all necessary parties in the litigation. Under the current schedule, responses to Mineral County's Motion to Intervene must be filed by February 1, 1999. Mineral County will have until March 1, 1999 to file its reply. If the Motion is granted, the Court will set a deadline for responses to the Mineral County complaint sometime in the Spring of 1999.

Again, as a water rights holder and a party named by the County in its complaint, it is important that you retain counsel to represent your interests. In the event the County's Motion to Intervene is granted, your failure to respond to the County's complaint, when required, could result in a loss or reduction of your water rights. If you are a member of WRID, Bridgeport Ranchers



Mr. Ron Arrache  
January 6, 1999  
Page 2

Organization or one of the other entities that had been a member of WUA, you may want to inquire with that entity for guidance on selecting new counsel. If you would like DeCuir & Somach to continue representing you, we will need to enter into a new legal services agreement whereby you will be directly responsible for payment of our services. In the event we represent a number of individual water rights holders with common interests in the litigation, we would allocate any common interest efforts on a pro rata basis among our clients. You are also free to retain the services of another attorney.

Please let us know if you desire DeCuir & Somach to continue representing you in this matter so we can provide you a new legal services agreement. If you have questions or need additional information, please do not hesitate to call Stuart Somach or me.

Very truly yours,



William E. Hvidsten

WEH:mm

WILLIAM E. HVIDSTEN

DE CUIR & SOMACH  
A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW  
400 CAPITOL MALL  
SUITE 1900  
SACRAMENTO, CA 95814-4407  
TELEPHONE (916) 446-7979  
FACSIMILE (916) 446-8199

January 6, 1999

Artesani Family Trust  
c/o E. J. and M. E. Artesani  
3024 Hauser Way  
Carson City, NV 89701

Re: Walker River Basin Water Users Association  
Mineral County Litigation

Dear E. J. and M. E. Artesani:

This letter is to inform you that the Walker River Basin Water Users Association ("WUA") Board of Directors recently voted to dissolve the organization. That dissolution results in the termination of DeCuir & Somach's legal services agreement with WUA. Under that agreement, WUA was to pay for all legal services provided to you by virtue of your membership in WUA and pursuant to a legal services agreement between you and DeCuir & Somach. As a result of the foregoing, DeCuir & Somach, regrettably, must terminate its existing legal services agreement with you.

Because you are a named party in the litigation and your water rights are subject to challenge by Mineral County and the Walker River Paiute Indian Tribe, it is very important that you retain new counsel as quickly as possible. Presently, the Court is still dealing with whether Mineral County has properly served all necessary parties in the litigation. Under the current schedule, responses to Mineral County's Motion to Intervene must be filed by February 1, 1999. Mineral County will have until March 1, 1999 to file its reply. If the Motion is granted, the Court will set a deadline for responses to the Mineral County complaint sometime in the Spring of 1999.

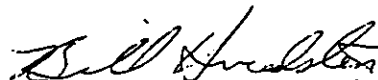
Again, as a water rights holder and a party named by the County in its complaint, it is important that you retain counsel to represent your interests. In the event the County's Motion to Intervene is granted, your failure to respond to the County's complaint, when required, could result in a loss or reduction of

E. J. and M. E. Artesani  
January 6, 1999  
Page 2

your water rights. If you are a member of WRID, Bridgeport Ranchers Organization or one of the other entities that had been a member of WUA, you may want to inquire with that entity for guidance on selecting new counsel. If you would like DeCuir & Somach to continue representing you, we will need to enter into a new legal services agreement whereby you will be directly responsible for payment of our services. In the event we represent a number of individual water rights holders with common interests in the litigation, we would allocate any common interest efforts on a pro rata basis among our clients. You are also free to retain the services of another attorney.

Please let us know if you desire DeCuir & Somach to continue representing you in this matter so we can provide you a new legal services agreement. If you have questions or need additional information, please do not hesitate to call Stuart Somach or me.

Very truly yours,



William E. Hvidsten

WEH:mm

WILLIAM E. HVIDSTEN

DE CUIR & SOMACH

A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW

400 CAPITOL MALL

SUITE 1900

SACRAMENTO, CA 95814-4407

TELEPHONE (916) 448-7879

FACSIMILE (916) 448-8199

January 6, 1999

Richard N. Fulstone  
2022 Nevada State Highway, No. 208  
Post Office Box 61  
Smith, NV 89430

Re: Walker River Basin Water Users Association  
Mineral County Litigation

Dear Mr. Fulstone:

This letter is to inform you that the Walker River Basin Water Users Association ("WUA") Board of Directors recently voted to dissolve the organization. That dissolution results in the termination of DeCuir & Somach's legal services agreement with WUA. Under that agreement, WUA was to pay for all legal services provided to you by virtue of your membership in WUA and pursuant to a legal services agreement between you and DeCuir & Somach. As a result of the foregoing, DeCuir & Somach, regrettably, must terminate its existing legal services agreement with you.

Because you are a named party in the litigation and your water rights are subject to challenge by Mineral County and the Walker River Paiute Indian Tribe, it is very important that you retain new counsel as quickly as possible. Presently, the Court is still dealing with whether Mineral County has properly served all necessary parties in the litigation. Under the current schedule, responses to Mineral County's Motion to Intervene must be filed by February 1, 1999. Mineral County will have until March 1, 1999 to file its reply. If the Motion is granted, the Court will set a deadline for responses to the Mineral County complaint sometime in the Spring of 1999.

Again, as a water rights holder and a party named by the County in its complaint, it is important that you retain counsel to represent your interests. In the event the County's Motion to Intervene is granted, your failure to respond to the County's complaint, when required, could result in a loss or reduction of

Richard N. Fulstone  
January 6, 1999  
Page 2

your water rights. If you are a member of WRID, Bridgeport Ranchers Organization or one of the other entities that had been a member of WUA, you may want to inquire with that entity for guidance on selecting new counsel. If you would like DeCuir & Somach to continue representing you, we will need to enter into a new legal services agreement whereby you will be directly responsible for payment of our services. In the event we represent a number of individual water rights holders with common interests in the litigation, we would allocate any common interest efforts on a pro rata basis among our clients. You are also free to retain the services of another attorney.

Please let us know if you desire DeCuir & Somach to continue representing you in this matter so we can provide you a new legal services agreement. If you have questions or need additional information, please do not hesitate to call Stuart Somach or me.

Very truly yours,



William E. Hvidsten

WEH:mm

WILLIAM E. HVIDSTEN

DE CUIR & SOMACH

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

400 CAPITOL MALL

SUITE 1900

SACRAMENTO, CA 95814-4407

TELEPHONE (916) 446-7979

FACSIMILE (916) 446-8199

January 6, 1999

Deborah Hartline  
Post Office Box 1343  
Quincy, CA 95971

Re: Walker River Basin Water Users Association  
Mineral County Litigation

Dear Ms. Hartline:

This letter is to inform you that the Walker River Basin Water Users Association ("WUA") Board of Directors recently voted to dissolve the organization. That dissolution results in the termination of DeCuir & Somach's legal services agreement with WUA. Under that agreement, WUA was to pay for all legal services provided to you by virtue of your membership in WUA and pursuant to a legal services agreement between you and DeCuir & Somach. As a result of the foregoing, DeCuir & Somach, regrettably, must terminate its existing legal services agreement with you.

Because you are a named party in the litigation and your water rights are subject to challenge by Mineral County and the Walker River Paiute Indian Tribe, it is very important that you retain new counsel as quickly as possible. Presently, the Court is still dealing with whether Mineral County has properly served all necessary parties in the litigation. Under the current schedule, responses to Mineral County's Motion to Intervene must be filed by February 1, 1999. Mineral County will have until March 1, 1999 to file its reply. If the Motion is granted, the Court will set a deadline for responses to the Mineral County complaint sometime in the Spring of 1999.

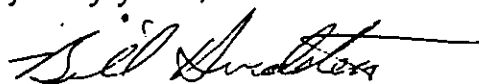
Again, as a water rights holder and a party named by the County in its complaint, it is important that you retain counsel to represent your interests. In the event the County's Motion to Intervene is granted, your failure to respond to the County's complaint, when required, could result in a loss or reduction of your water rights. If you are a member of WRID, Bridgeport Ranchers

Deborah Hartline  
January 6, 1999  
Page 2.

Organization or one of the other entities that had been a member of WUA, you may want to inquire with that entity for guidance on selecting new counsel. If you would like DeCuir & Somach to continue representing you, we will need to enter into a new legal services agreement whereby you will be directly responsible for payment of our services. In the event we represent a number of individual water rights holders with common interests in the litigation, we would allocate any common interest efforts on a pro rata basis among our clients. You are also free to retain the services of another attorney.

Please let us know if you desire DeCuir & Somach to continue representing you in this matter so we can provide you a new legal services agreement. If you have questions or need additional information, please do not hesitate to call Stuart Somach or me.

Very truly yours,



William E. Hvidsten

WEH:mm

WILLIAM E. HVIDSTEN

DE CUIR & SOMACH

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

400 CAPITOL MALL

SUITE 1900

SACRAMENTO, CA 95814-4407

TELEPHONE (916) 446-7979

FACSIMILE (916) 446-8189

January 26, 1999

Terry Hawkins  
Margaret Hawkins  
945 E. Main Street, #168  
Fernley, NV 89801

Re: Walker River Basin Water Users Association  
Mineral County Litigation

Dear Terry and Margaret Hawkins:

This letter is to inform you that the Walker River Basin Water Users Association ("WUA") Board of Directors recently voted to dissolve the organization. That dissolution results in the termination of DeCuir & Somach's legal services agreement with WUA. Under that agreement, WUA was to pay for all legal services provided to you by virtue of your membership in WUA and pursuant to a legal services agreement between you and DeCuir & Somach. As a result of the foregoing, DeCuir & Somach, regrettably, must terminate its existing legal services agreement with you.

Because you are a named party in the litigation and your water rights are subject to challenge by Mineral County and the Walker River Paiute Indian Tribe, it is very important that you retain new counsel as quickly as possible. Presently, the Court is still dealing with whether Mineral County has properly served all necessary parties in the litigation. Under the current schedule, responses to Mineral County's Motion to Intervene must be filed by February 1, 1999. Mineral County will have until March 1, 1999 to file its reply. If the Motion is granted, the Court will set a deadline for responses to the Mineral County complaint sometime in the Spring of 1999.

Again, as a water rights holder and a party named by the County in its complaint, it is important that you retain counsel to represent your interests. In the event the County's Motion to Intervene is granted, your failure to respond to the County's complaint, when required, could result in a loss or reduction of your water rights. If you are a member of WRID, Bridgeport Ranchers Organization or one of the other entities that had been a member of WUA, you may want to inquire with

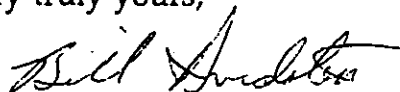


Terry and Margaret Hawkins  
January 26, 1999  
Page 2

that entity for guidance on selecting new counsel. If you would like DeCuir & Somach to continue representing you, we will need to enter into a new legal services agreement whereby you will be directly responsible for payment of our services. In the event we represent a number of individual water rights holders with common interests in the litigation, we would allocate any common interest efforts on a pro rata basis among our clients. You are also free to retain the services of another attorney.

Please let us know if you desire DeCuir & Somach to continue representing you in this matter so we can provide you a new legal services agreement. If you have questions or need additional information, please do not hesitate to call Stuart Somach or me.

Very truly yours,



William E. Hvidsten

WEH:mm

WILLIAM E. HVIDSTEN

DE CUIR & SOMACH  
A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW  
400 CAPITOL MALL  
SUITE 1900  
SACRAMENTO, CA 95814-4407  
TELEPHONE (916) 446-7979  
FACSIMILE (916) 446-8199

January 6, 1999

Virginia Lakes Mutual Water Company  
c/o Don Meier  
4495 Gibraltar Drive  
Reno, NV 89509

Re: Walker River Basin Water Users Association  
Mineral County Litigation

Dear Mr. Meier:

This letter is to inform you that the Walker River Basin Water Users Association ("WUA") Board of Directors recently voted to dissolve the organization. That dissolution results in the termination of DeCuir & Somach's legal services agreement with WUA. Under that agreement, WUA was to pay for all legal services provided to you by virtue of your membership in WUA and pursuant to a legal services agreement between you and DeCuir & Somach. As a result of the foregoing, DeCuir & Somach, regrettably, must terminate its existing legal services agreement with you.

Because you are a named party in the litigation and your water rights are subject to challenge by Mineral County and the Walker River Paiute Indian Tribe, it is very important that you retain new counsel as quickly as possible. Presently, the Court is still dealing with whether Mineral County has properly served all necessary parties in the litigation. Under the current schedule, responses to Mineral County's Motion to Intervene must be filed by February 1, 1999. Mineral County will have until March 1, 1999 to file its reply. If the Motion is granted, the Court will set a deadline for responses to the Mineral County complaint sometime in the Spring of 1999.

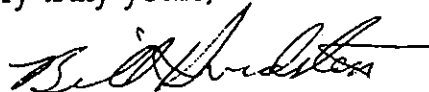
Again, as a water rights holder and a party named by the County in its complaint, it is important that you retain counsel to represent your interests. In the event the County's Motion to Intervene is granted, your failure to respond to the County's complaint, when required, could result in a loss or reduction of

Virginia Lakes Mutual Water Company  
January 6, 1999  
Page 2

your water rights. If you are a member of WRID, Bridgeport Ranchers Organization or one of the other entities that had been a member of WUA, you may want to inquire with that entity for guidance on selecting new counsel. If you would like DeCuir & Somach to continue representing you, we will need to enter into a new legal services agreement whereby you will be directly responsible for payment of our services. In the event we represent a number of individual water rights holders with common interests in the litigation, we would allocate any common interest efforts on a pro rata basis among our clients. You are also free to retain the services of another attorney.

Please let us know if you desire DeCuir & Somach to continue representing you in this matter so we can provide you a new legal services agreement. If you have questions or need additional information, please do not hesitate to call Stuart Somach or me.

Very truly yours,



William E. Hvidsten

WEH:mm

WILLIAM E. HVIDSTEN

DE CUIR & SOMACH

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

400 CAPITOL MALL

SUITE 1900

SACRAMENTO, CA 95814-4407

TELEPHONE (916) 446-7979

FACSIMILE (916) 446-8199

January 6, 1999

David Parraguirre  
1700 Wendy Way  
Reno, NV 89509

Re: Walker River Basin Water Users Association  
Mineral County Litigation

Dear Mr. Parraguirre:

This letter is to inform you that the Walker River Basin Water Users Association ("WUA") Board of Directors recently voted to dissolve the organization. That dissolution results in the termination of DeCuir & Somach's legal services agreement with WUA. Under that agreement, WUA was to pay for all legal services provided to you by virtue of your membership in WUA and pursuant to a legal services agreement between you and DeCuir & Somach. As a result of the foregoing, DeCuir & Somach, regrettably, must terminate its existing legal services agreement with you.

Because you are a named party in the litigation and your water rights are subject to challenge by Mineral County and the Walker River Paiute Indian Tribe, it is very important that you retain new counsel as quickly as possible. Presently, the Court is still dealing with whether Mineral County has properly served all necessary parties in the litigation. Under the current schedule, responses to Mineral County's Motion to Intervene must be filed by February 1, 1999. Mineral County will have until March 1, 1999 to file its reply. If the Motion is granted, the Court will set a deadline for responses to the Mineral County complaint sometime in the Spring of 1999.

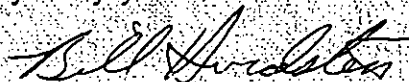
Again, as a water rights holder and a party named by the County in its complaint, it is important that you retain counsel to represent your interests. In the event the County's Motion to Intervene is granted, your failure to respond to the County's complaint, when required, could result in a loss or reduction of your water rights. If you are a member of WRID, Bridgeport Ranchers

David Parraguirre  
January 6, 1999  
Page 2

Organization or one of the other entities that had been a member of WUA, you may want to inquire with that entity for guidance on selecting new counsel. If you would like DeCuir & Somach to continue representing you, we will need to enter into a new legal services agreement whereby you will be directly responsible for payment of our services. In the event we represent a number of individual water rights holders with common interests in the litigation, we would allocate any common interest efforts on a pro-rata basis among our clients. You are also free to retain the services of another attorney.

Please let us know if you desire DeCuir & Somach to continue representing you in this matter so we can provide you a new legal services agreement. If you have questions or need additional information, please do not hesitate to call Stuart Somach or me.

Very truly yours,



William E. Hvidsten

WEH:mm

WILLIAM E. HVIDSTEN

DE CUIR & SOMACH

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

400 CAPITOL MALL

SUITE 1900

SACRAMENTO, CA 95814-4407

TELEPHONE (916) 446-7979

FACSIMILE (916) 446-8199

January 6, 1999

Plymouth Land and Stock  
c/o Louis W. Bergevin  
Post Office Box 188  
Gardnerville, NV 89410

Re: Walker River Basin Water Users Association  
Mineral County Litigation

Dear Mr. Bergevin:

This letter is to inform you that the Walker River Basin Water Users Association ("WUA") Board of Directors recently voted to dissolve the organization. That dissolution results in the termination of DeCuir & Somach's legal services agreement with WUA. Under that agreement, WUA was to pay for all legal services provided to you by virtue of your membership in WUA and pursuant to a legal services agreement between you and DeCuir & Somach. As a result of the foregoing, DeCuir & Somach, regrettably, must terminate its existing legal services agreement with you.

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Again, as a water rights holder and a party named by the County in its complaint, it is important that you retain counsel to represent your interests. In the event the County's Motion to Intervene is granted, your failure to respond to the County's complaint, when required, could result in a loss or reduction of

Plymouth Land and Stock  
January 6, 1999  
Page 2

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Please let us know if you desire DeCuir & Somach to continue representing you in this matter so we can provide you a new legal services agreement. If you have questions or need additional information, please do not hesitate to call Stuart Somach or me.

Very truly yours,



William E. Hvidsten

WEH:mm

WILLIAM E. HVIDSTEN

DE CUIR & SOMACH  
A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW  
400 CAPITOL MALL  
SUITE 1900  
SACRAMENTO, CA 95814-4407  
TELEPHONE (916) 446-7979  
FACSIMILE (916) 446-8199

January 6, 1999

Sario Livestock Co.  
c/o Beatrice Presto  
1462 Douglas Avenue  
Gardnerville, NV 89410

Re: Walker River Basin Water Users Association  
Mineral County Litigation

Dear Ms. Presto:

This letter is to inform you that the Walker River Basin Water Users Association ("WUA") Board of Directors recently voted to dissolve the organization. That dissolution results in the termination of DeCuir & Somach's legal services agreement with WUA. Under that agreement, WUA was to pay for all legal services provided to you by virtue of your membership in WUA and pursuant to a legal services agreement between you and DeCuir & Somach. As a result of the foregoing, DeCuir & Somach, regrettably, must terminate its existing legal services agreement with you.

Because you are a named party in the litigation and your water rights are subject to challenge by Mineral County and the Walker River Paiute Indian Tribe, it is very important that you retain new counsel as quickly as possible. Presently, the Court is still dealing with whether Mineral County has properly served all necessary parties in the litigation. Under the current schedule, responses to Mineral County's Motion to Intervene must be filed by February 1, 1999. Mineral County will have until March 1, 1999 to file its reply. If the Motion is granted, the Court will set a deadline for responses to the Mineral County complaint sometime in the Spring of 1999.

Again, as a water rights holder and a party named by the County in its complaint, it is important that you retain counsel to represent your interests. In the event the County's Motion to Intervene is granted, your failure to respond to the County's complaint, when required, could result in a loss or reduction of

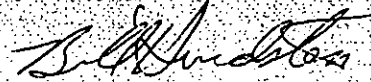


Sario Livestock Co.  
January 6, 1999  
Page 2

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Please let us know if you desire DeCuir & Somach to continue representing you in this matter so we can provide you a new legal services agreement. If you have questions or need additional information, please do not hesitate to call Stuart Somach or me.

Very truly yours,



William E. Hvidsten

WEH:mm

WILLIAM E. HVIDSTEN

DE CUIR & SOMACH  
A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW  
400 CAPITOL MALL  
SUITE 1800  
SACRAMENTO, CA 95814-4407  
TELEPHONE (916) 446-7979  
FACSIMILE (916) 446-8199

January 6, 1999

David A. Sceirine  
Joe Sceirine  
Post Office Box 1013  
Yerington, NV 89447

Re: Walker River Basin Water Users Association  
Mineral County Litigation

Dear Messrs. Sceirine:

This letter is to inform you that the Walker River Basin Water Users Association ("WUA") Board of Directors recently voted to dissolve the organization. That dissolution results in the termination of DeCuir & Somach's legal services agreement with WUA. Under that agreement, WUA was to pay for all legal services provided to you by virtue of your membership in WUA and pursuant to a legal services agreement between you and DeCuir & Somach. As a result of the foregoing, DeCuir & Somach, regrettably, must terminate its existing legal services agreement with you.

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David A. Sceirine  
Joe Sceirine  
January 6, 1999  
Page 2

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Please let us know if you desire DeCuir & Somach to continue representing you in this matter so we can provide you a new legal services agreement. If you have questions or need additional information, please do not hesitate to call Stuart Somach or me.

Very truly yours,



William E. Hvidsten

WEH:mm

WILLIAM E. HVIDSTEN

DE CUIR & SOMACH

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

400 CAPITOL MALL

SUITE 1900

SACRAMENTO, CA 95814-4407

TELEPHONE (916) 446-7979

FACSIMILE (916) 446-8199

January 6, 1999

Jack Sceirine  
Beverly Sceirine  
Post Office Box 249  
Yerington, NV 89447

Re: Walker River Basin Water Users Association  
Mineral County Litigation

Dear Jack and Beverly Sceirine:

This letter is to inform you that the Walker River Basin Water Users Association ("WUA") Board of Directors recently voted to dissolve the organization. That dissolution results in the termination of DeCuir & Somach's legal services agreement with WUA. Under that agreement, WUA was to pay for all legal services provided to you by virtue of your membership in WUA and pursuant to a legal services agreement between you and DeCuir & Somach. As a result of the foregoing, DeCuir & Somach, regrettably, must terminate its existing legal services agreement with you.

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Jack Sceirine  
Beverly Sceirine  
January 6, 1999  
Page 2

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Very truly yours,



William E. Hvidsten

WEH:mm

WILLIAM E. HVIDSTEN

DE CUIR & SOMACH  
A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW  
400 CAPITOL MALL  
SUITE 1900  
SACRAMENTO, CA 95814-4407  
TELEPHONE (916) 446-7979  
FACSIMILE (916) 446-8199

January 6, 1999

Kenneth Strosnider  
Carol Strosnider  
Post Office Box 26  
Smith, NV 89430

Re: Walker River Basin Water Users Association  
Mineral County Litigation

Dear Kenneth and Carol Strosnider:

This letter is to inform you that the Walker River Basin Water Users Association ("WUA") Board of Directors recently voted to dissolve the organization. That dissolution results in the termination of DeCuir & Somach's legal services agreement with WUA. Under that agreement, WUA was to pay for all legal services provided to you by virtue of your membership in WUA and pursuant to a legal services agreement between you and DeCuir & Somach. As a result of the foregoing, DeCuir & Somach, regrettably, must terminate its existing legal services agreement with you.

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Kenneth Strosnider  
Carol Strosnider  
January 6, 1999  
Page 2

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Very truly yours,



William E. Hvidsten

WEH:mm

WILLIAM E. HVIDSTEN

DE CUIR & SOMACH

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

400 CAPITOL MALL

SUITE 1900

SACRAMENTO, CA 95814-4407

TELEPHONE (916) 446-7979

FACSIMILE (916) 446-8199

January 6, 1999

Talbot Land & Livestock  
c/o Thomas J. Talbot  
1650 North Sierra Highway  
Bishop, CA 93514

Re: Walker River Basin Water Users Association  
Mineral County Litigation

Dear Mr. Talbot:

This letter is to inform you that the Walker River Basin Water Users Association ("WUA") Board of Directors recently voted to dissolve the organization. That dissolution results in the termination of DeCuir & Somach's legal services agreement with WUA. Under that agreement, WUA was to pay for all legal services provided to you by virtue of your membership in WUA and pursuant to a legal services agreement between you and DeCuir & Somach. As a result of the foregoing, DeCuir & Somach, regrettably, must terminate its existing legal services agreement with you.

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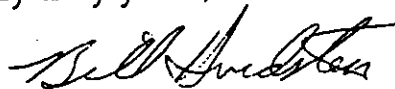


Talbot Land & Livestock  
January 6, 1999  
Page 2

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Please let us know if you desire DeCuir & Somach to continue representing you in this matter so we can provide you a new legal services agreement. If you have questions or need additional information, please do not hesitate to call Stuart Somach or me.

Very truly yours,



William E. Hvidsten

WEH:mm

WILLIAM E. HVIDSTEN

DE CUIR & SOMACH  
A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW  
400 CAPITOL MALL  
SUITE 1900  
SACRAMENTO, CA 95814-4407  
TELEPHONE (916) 446-7979  
FACSIMILE (916) 446-8199

January 6, 1999

Rachel Tholke Trust  
c/o Dawn Cooper, Trustee  
Post Office Box 97  
Coleville, CA 96107

Re: Walker River Basin Water Users Association  
Mineral County Litigation

Dear Ms. Cooper:

This letter is to inform you that the Walker River Basin Water Users Association ("WUA") Board of Directors recently voted to dissolve the organization. That dissolution results in the termination of DeCuir & Somach's legal services agreement with WUA. Under that agreement, WUA was to pay for all legal services provided to you by virtue of your membership in WUA and pursuant to a legal services agreement between you and DeCuir & Somach. As a result of the foregoing, DeCuir & Somach, regrettably, must terminate its existing legal services agreement with you.

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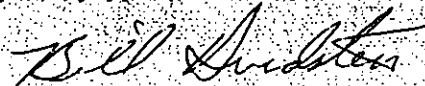
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Rachel Tholke Trust  
January 6, 1999  
Page 2

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Very truly yours,



William E. Hvidsten

WEH:mm

WILLIAM E. HVIDSTEN

DE CUIR & SOMACH

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

400 CAPITOL MALL

SUITE 1900

SACRAMENTO, CA 95814-4407

TELEPHONE (916) 446-7979

FACSIMILE (916) 446-8199

January 6, 1999

Twelves Family Trust  
c/o Roy Snyder and Joanne Rice  
Elizabeth Aadnesen  
4164 South Syracuse  
Denver, CO 80237

Re: Walker River Basin Water Users Association  
Mineral County Litigation

Dear Mr. Snyder, Ms. Rice and Ms. Aadnesen:

This letter is to inform you that the Walker River Basin Water Users Association ("WUA") Board of Directors recently voted to dissolve the organization. That dissolution results in the termination of DeCuir & Somach's legal services agreement with WUA. Under that agreement, WUA was to pay for all legal services provided to you by virtue of your membership in WUA and pursuant to a legal services agreement between you and DeCuir & Somach. As a result of the foregoing, DeCuir & Somach, regrettably, must terminate its existing legal services agreement with you.

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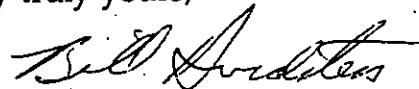
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Twelves Family Trust  
January 6, 1999  
Page 2

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Very truly yours,



William E. Hvidsten

WEH:mm

WILLIAM E. HVIDSTEN

DE CUIR & SOMACH  
A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW  
400 CAPITOL MALL  
SUITE 1900  
SACRAMENTO, CA 95814-4407  
TELEPHONE (916) 446-7979  
FACSIMILE (916) 446-8199

January 6, 1999

Sweetwater Ranch  
c/o William W. Weaver, Jr.  
2535 State Route 338  
Wellington, NV 89444

Re: Walker River Basin Water Users Association  
Mineral County Litigation

Dear Mr. Weaver:

This letter is to inform you that the Walker River Basin Water Users Association ("WUA") Board of Directors recently voted to dissolve the organization. That dissolution results in the termination of DeCuir & Somach's legal services agreement with WUA. Under that agreement, WUA was to pay for all legal services provided to you by virtue of your membership in WUA and pursuant to a legal services agreement between you and DeCuir & Somach. As a result of the foregoing, DeCuir & Somach, regrettably, must terminate its existing legal services agreement with you.

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Sweetwater Ranch  
January 6, 1999  
Page 2

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Please let us know if you desire DeCuir & Somach to continue representing you in this matter so we can provide you a new legal services agreement. If you have questions or need additional information, please do not hesitate to call Stuart Somach or me.

Very truly yours,



William E. Hvidsten

WEH:mm





October 12, 1999

## BRIDGEPORT RANCHER'S ORGANIZATION

Fellow members,

This subject of this letter concerns your legal representation in potential Walker River Paiute Tribe and Mineral County litigation. George Benesch as you know, is the attorney selected by the BRO search committee and subsequently approved by vote of the BRO membership at the June 1999 meeting. George is ready to represent all of us however there is a formality which needs to be addressed first.

Ethical attorneys, it turns out, are very reluctant to solicit or appear to solicit clients. Because of this conscientious consideration, in order for George Benesch to represent each of us, we must request that he be our attorney (individually). Thus I am enclosing a sample letter which you are free to use, that requests Mr. Benesch be your legal representative in Walker River Decree matters. If you still want George to be your representative as you did in June please send this letter to Mr. Benesch as soon as possible. This will do three things. One, it will release Decuir and Somach, the former Water User's Attorneys from representing you. Two, George Benesch will be in place to represent your interests. Three, you and the BRO will be ready to respond legally and in a timely way when it becomes necessary. Mr. Benesch will not need a retainer paid in advance and is willing to bill all of us collectively.

One final legal matter needs to be taken care of here and that is releasing Decuir and Somach from representing the members of the BRO. If you signed a request for Decuir and Somach to represent you as part of the membership in the Walker River Basin Water User's Assoc., then you should send them a letter stating that you no longer need their services in Walker River Decree matters. This will free them from any obligation to represent you; or to bill you. If you have your own attorney or do not need representation in this matter you do not need to respond to Mr. Benesch.

If you send in the "request letter" that is provided, please fill in your name and address and sign and date the letter before mailing.

If you have any questions or concerns please call me at (775) 465-2579.

Sincerely,

Jeff Hunewill  
Chairman BRO



Exhibit C

Artesani Family Trust

Fulstone, Richard

Hartline, Deborah

Hawkins, Terry and Hawkins, Margaret

Meier, Don/Virginia Lakes Mutual Water

Parraguirre, David

Plymouth Land & Stock

Sceirine, David

Sceirine, Joe

Sceirine, Jack and Sceirine, Beverly

Strosnider, Kenneth

Talbot, Tom

Rachel Tholke Trust, c/o Dawn Cooper, Trustee

Twelves Family Trust

Weaver, William/Sweetwater Ranch