

IN THE SUPREME COURT OF THE STATE OF NEVADA

Electronically Filed
Nov 19 2020 01:46 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

DIAMOND NATURAL RESOURCES
PROTECTION AND CONSERVATION
ASSOCIATION, et al,

Appellant,

vs.

TIMOTHY LEE BAILEY, et al,

Respondents.

**SADLER RANCH, LLC AND IRA AND MONTIRA RENNER’S JOINDER
TO PACIFIC LAW FOUNDATION’S MOTION FOR LEAVE TO FILE
BRIEF OF AMICUS CURIAE IN SUPPORT OF RESPONDENTS**

Respondents Sadler Ranch, LLC and Ira & Montira Renner, by and through their counsel of record, Paul G. Taggart, Esq. and David H. Rigdon, Esq., of the law firm of Taggart & Taggart, Ltd., hereby join in the Pacific Law Foundation’s motion for leave to file an amicus curiae brief in this matter.

The issue discussed in the proposed amicus curiae brief (the level and scope of deference afforded to State Engineer legal determinations) is an issue of statewide importance which has implications in several other cases currently pending before this Court.¹ This Court will greatly benefit from the Pacific Legal Foundation’s

¹ See e.g. *Wilson v. Pahrump Fair Water* (Case No. 77722); *Eureka Cnty. v. Sadler Ranch, LLC* (Case No. 75736); *Abermarle v. Wilson* (Case No. 81886).

extensive knowledge of this issue and how other states are approaching it. Accordingly, the motion for leave should be granted and the amicus curiae brief accepted for consideration.

Respectfully submitted this 19th day of November, 2020.

TAGGART & TAGGART, LTD.
108 North Minnesota Street
Carson City, Nevada 89703
(775) 882-9900 – Telephone
(775) 883-9900 – Facsimile

By: /s/ David H. Rigdon
PAUL G. TAGGART, ESQ.
Nevada State Bar No. 6136
DAVID H. RIGDON, ESQ.
Nevada State Bar No. 13567

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

Pursuant to NRAP 25(b), I certify that I am an employee of TAGGART & TAGGART, LTD., and that on this day, I served, or caused to be served, a true and correct copy of the foregoing Joinder by U.S. Mail to:

Beth Mills, Trustee, Marshall Family Trust
HC 62 Box 62138
Eureka, NV 89316

John E. Marvel, Esq.
Marvel & Marvel, Ltd.
217 Idaho Street Elko, NV 89801

All other counsel in this case are registered E-Flex users and were served electronically through the E-Flex Court system.

DATED this 19th day of November, 2020.

/s/ David H. Rigdon
Employee of TAGGART & TAGGART, LTD.