

IN THE SUPREME COURT OF THE STATE OF NEVADA

IN THE MATTER OF THE
DETERMINATION OF THE RELATIVE
RIGHTS IN AND TO ALL WATERS,
BOTH SURFACE AND
UNDERGROUND, LOCATED WITHIN
THE DIAMOND VALLEY
HYDROGRAPHIC BASIN 10-153,
EUREKA AND ELKO COUNTIES,
NEVADA.

THE STATE OF NEVADA
DEPARTMENT OF CONSERVATION
AND NATURAL RESOURCES,
DIVISION OF WATER RESOURCES;
and ADAM SULLIVAN, P.E., STATE
ENGINEER,

Appellants,

vs.

SOLARLJOS, LLC; DANIEL S.
VENTURACCI; AMANDA L.
VENTURACCI; CHAD D. BLISS;
ROSIE J. BLISS; WILFRED BAILEY
AND CAROLYN BAILEY, TRUSTEES
OF THE WILFRED AND CAROLYN
BAILEY FAMILY TRUST DATED
FEBRUARY 20, 2018; EUREKA
COUNTY; JAMES E. BAUMANN;
VERA L. BAUMANN; NORMAN C.
FITZWATER; KINDY L. FITZWATER;
ARC DOME PARTNERS, LLC;
ROBERT F. BECK AND KAREN A.
BECK, TRUSTEES OF THE BECK
FAMILY TRUST DATED APRIL 1,
2005; IRA R. RENNER; MONTIRA
RENNER; SADLER RANCH, LLC;

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Feb 25 2022 11:00 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

Supreme Court No. 84275

District Court Case No. CV-2002009

MW CATTLE, LLC; UNITED STATES
DEPARTMENT OF INTERIOR,
BUREAU OF LAND MANAGEMENT;
PETER GOICOECHEA; and GLADY
GOICOECHEA,

Respondents.

**APPELLANT STATE ENGINEER’S MOTION TO EXCEED PAGE LIMIT
FOR EMERGENCY MOTION FOR STAY**

Appellant, the State of Nevada, Department of Conservation and Natural Resources, Division of Water Resources, and Adam Sullivan, P.E., in his capacity as the Nevada State Engineer (hereafter “State Engineer”), by and through counsel, Nevada Attorney General Aaron D. Ford, Senior Deputy Attorney General James N. Bolotin, and Deputy Attorney General Ian Carr, hereby moves to exceed the ten-page limit on motions imposed by NRAP 27(d)(2) for his Emergency Motion Under NRAP 27(e) for Stay of District Court’s Corrected Order Granting Solarljós, LLC’s Motion for Partial Summary Judgment and Stay of Adjudication Proceedings Pending Appeal and Request for Temporary Stay Pending Decision on Underlying Motion for Stay (“Motion for Stay”). This motion is supported by the following points and authorities. A copy of the Motion for Stay (without exhibits) is attached hereto as Exhibit 1.

POINTS AND AUTHORITIES

NRAP 27(d)(2) states “[a] motion...shall not exceed 10 pages, unless the court permits or directs otherwise.” NRAP 32(a)(7)(D) authorizes the filing of a

motion to file a brief that exceed the applicable page limit “on a showing of diligence and good cause.” The State Engineer cites NRAP 32(a)(7)(D) by analogy here and complies with its requirements.

The State Engineer respectfully requests leave to exceed the page limit pursuant to NRAP 27(d)(2) because the issues presented in the Motion for Stay required more pages than the rule allows. This case involves a matter of statewide public importance, and the State Engineer could not condense the full background of this case and the discussion of the NRAP 8(c) factors in just 10 pages. The Motion for Stay is 14 pages, not including exhibits, so the State Engineer seeks leave to file an extra 4 pages more than allowed under NRAP 27(d)(2). Counsel for the State Engineer worked diligently to present the Motion for Stay in a concise manner, while also referencing the district court’s order denying a similar motion.

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The State Engineer respectfully submits that he has exercised diligence and demonstrated good cause to exceed the 10-page limit in NRAP 27(d)(2) and respectfully requests leave to do so.

RESPECTFULLY SUBMITTED this 25th day of February, 2022.

AARON D. FORD
Attorney General

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CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General and that on this 25th day of February, 2022, I served a copy of the foregoing APPELLANT STATE ENGINEER'S MOTION TO EXCEED PAGE LIMIT FOR EMERGENCY MOTION FOR STAY, by the Nevada Supreme Court's EFlex Electronic Filing System, addressed to:

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INDEX OF EXHIBITS

EXHIBIT No.	EXHIBIT DESCRIPTION	NUMBER OF PAGES
1.	Emergency Motion Under NRAP 27(e) for Stay of District Court's Corrected Order Granting Solarljós, LLC'S Motion for Partial Summary Judgment and Stay of Adjudication Proceedings Pending Appeal and Request for Temporary Stay Pending Decision on Underlying Motion for Stay (without exhibits)	22

EXHIBIT 1

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IN THE SUPREME COURT OF THE STATE OF NEVADA

IN THE MATTER OF THE
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RIGHTS IN AND TO ALL WATERS,
BOTH SURFACE AND
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2005; IRA R. RENNER; MONTIRA
RENNER; SADLER RANCH, LLC;

MW CATTLE, LLC; UNITED STATES
DEPARTMENT OF INTERIOR,
BUREAU OF LAND MANAGEMENT;
PETER GOICOECHEA; and GLADY
GOICOECHEA,

Respondents.

**EMERGENCY MOTION UNDER NRAP 27(e)
FOR STAY OF DISTRICT COURT’S CORRECTED ORDER GRANTING
SOLARLJOS, LLC’S MOTION FOR PARTIAL SUMMARY JUDGMENT
AND STAY OF ADJUDICATION PROCEEDINGS PENDING APPEAL
AND REQUEST FOR TEMPORARY STAY PENDING DECISION ON
UNDERLYING MOTION FOR STAY**

IMMEDIATE ACTION REQUESTED

Appellant, the State of Nevada, Department of Conservation and Natural Resources, Division of Water Resources, and Adam Sullivan, P.E., in his capacity as the Nevada State Engineer (hereafter “State Engineer”), by and through counsel, Nevada Attorney General Aaron D. Ford, Senior Deputy Attorney General James N. Bolotin, and Deputy Attorney General Ian Carr hereby files this Motion requesting a stay of the district court’s corrected order granting Solarljios, LLC’s motion for partial summary judgment (“Order Granting Partial Summary Judgment”) and requesting a stay of the adjudication proceedings as a whole pending this appeal on an emergency basis. This Motion is based upon the following points and authorities, and all pleadings and papers on file in this case.

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MEMORANDUM OF POINTS AND AUTHORITIES

I. BACKGROUND FOR STAY REQUEST

The underlying appeal in this case stems from an interlocutory order in the Matter of the Determination of the Relative Rights in and to All Waters, both Surface and Underground, Located Within the Diamond Valley Hydrographic Basin No. 10-153, Eureka and Elko Counties, Nevada (hereafter the “Diamond Valley Adjudication”). In Nevada, water law proceedings, particularly those related to adjudications, are “special in character, and the provisions of such law not only lay down the method of procedure but strictly limits it to that provided.” *Application of Filippini*, 66 Nev. 17, 27, 202 P.2d 535, 540 (1949). In adjudication proceedings, all parties filing claims and exceptions during the adjudication process are considered adverse. *In re Water Rights in Silver Creek and its Tributaries, in Lander Cty.*, 57 Nev. 232, 61 P.2d 987, 989 (1936) (“all claimants or water users in an adjudication proceeding under the act are adverse”). However, the State Engineer’s role is more akin to a special master or referee, who compiles and files the Order of Determination, rather than a party who is adverse to the interests of the claimants/water users. *See Pitt v. Scrugham*, 44 Nev. 418, 195 P. 1101, 1104 (1921) (“the state engineer and district courts are to act as co—ordinate agencies to effect, with the least possible expense, a speedy determination, for administrative purposes, of the relative rights of various claimants to the waters of

a stream or stream system, in order to make water do its full duty; that it may not be wasted, and that it shall be employed to the fullest extent. Since the state engineer in the instant case, as an administrative officer, was only proceeding to do what the court might require him to do in the Anker Case, the averments of the complaint relative to its pendency furnish no ground for injunctive relief”) (emphasis added); *see also* James H. Davenport, *Nevada Water Law* (2003) at 106–107.

The State Engineer on numerous occasions reiterated what he believes to be his proper role in the adjudication process, including as early as April 27, 2020, in his Notice to the Court (*see* Exhibit 1) and during a status conference held on the record on August 25, 2020.¹ This position was reiterated over the course of the adjudication, and seemingly confirmed by the district court. *See, e.g.*, State Engineer’s Limited Non-Opposition to Eureka County’s Motion Regarding Scope of Hearing, p. 2, attached hereto as Exhibit 2; State Engineer’s Pre-Trial Brief for the Hearing on Exceptions filed by Sadler Ranch and MW Cattle, attached hereto as Exhibit 3; and Order Granting Eureka County’s Motion to Intervene, p. 10, attached hereto as Exhibit 4.

Despite these facts and controlling law, the district court rejected the State Engineer’s arguments against Solarljós, LLC’s NRCP 54(b) motion seeking to

¹ The State Engineer is in the process of obtaining a transcript from the August 25, 2020, hearing.

certify as final the Order Granting Partial Summary Judgment. *See* Order Granting Solarljios, LLC's Motion for Certification of Judgment on Solarljios, LLC's Exception in this Adjudication Proceeding, attached hereto as Exhibit 5; *see also* State Engineer's Response to Solarljios LLC's Request/Motion for Certification of Summary Judgment Pursuant to NRCP 54(b), attached hereto as Exhibit 6. Furthermore, despite the State Engineer's unique role and the special character of the procedure in adjudication proceedings under NRS Chapter 533, the district court permitted discovery and dispositive motion practice in these proceedings despite the absence of any applicable procedure prescribed by NRS Chapter 533. NRS 533.170(2) states that no other pleadings should be filed in the cause besides the Order of Determination and exceptions thereto. NRS 533.170(3) requires that a hearing be held even if no exceptions are filed, and NRS 533.170(4) requires that parties who filed exceptions shall have those heard at the time set for hearing "until such exceptions are disposed of." The only provision regarding depositions in the adjudication statutes is NRS 533.150, and that is related to State Engineer's evidence gathering process in hearing objections to the preliminary order of determination.

While NRS 533.170(5) states that the hearing on exceptions to the order of determination, and testimony taken thereunder, "shall be as nearly as may be in accordance with the Nevada Rules of Civil Procedure," this does not mean that the

entire adjudication must adhere to all aspects of standard civil practice, as that would render much of NRS 533.087 through NRS 533.320, as well as the previously cited portions of *Application of Filippini*, meaningless.² In fact, in response to Solarljøs, LLC’s NRCP 54(b) motion, the State Engineer argued that NRCP 54(b) should not be applied to adjudications at all. *See* Exhibit 6.

Thus, the State Engineer believes that the district court has erred through its imposed procedure throughout this adjudication, as illustrated in the now appealable Order Granting Partial Summary Judgment for Solarljøs, LLC. Further, the State Engineer simultaneously files a Motion with this Court to determine whether NRCP 54(b) certification was appropriately granted by the district court pursuant to *Fernandez v. Infusaid Corp.*, 110 Nev. 187, 871 P.2d 292 (1994).

The State Engineer is especially troubled that the district court granted Solarljøs’s partial motion for summary judgment, at least in part, on the basis that “no oppositions were filed to Solarljøs’ Motion for Partial Summary Judgment” despite the State Engineer’s unique role in these proceedings and repeated position on the record and in filings that the Order of Determination and evidence filed therewith stand on their own merits and that the State Engineer is here to assist the district court. *See* Order Granting Partial Summary Judgment, p. 1, ll. 15–17;

² Nevada courts endeavor to interpret statutes as a whole, so as not to render any provisions superfluous or nugatory. *See Rural Tel. Co. v. PUCN*, 133 Nev. 387, 389, 398 P.3d 909, 911 (2017) (internal citation omitted).

see also Exhibit 2, p. 2; Exhibit 3. The district court also subsequently indicated that it “overturned” the State Engineer’s Order of Determination because “the State Engineer based his decision on evidence that was never made part of the record.” *See* Exhibit 5, p. 4, ll. 18–20. This is despite the State Engineer’s clear compliance with NRS 533.165(1) thus making the Order of Determination, “together with the copies of the original evidence and transcript of testimony filed with, or taken before, the State Engineer, duly certified by the State Engineer” part of the court’s record for purposes of this proceeding. This presented a clear fact issue.

Lastly, the State Engineer remains concerned that, in his reading, the law requires, after the hearing on exceptions, a single decree affirming or modifying the State Engineer’s Order of Determination. NRS 533.185(1). The State Engineer maintains that all claims asserted in an adjudication are so closely related that the Nevada Supreme Court is now tasked with deciding important issues still pending in the district court, and there are also significant logistical challenges associated with the district court issuing essentially separate “miniature” decrees given the State Engineer’s role as an officer of the district court in distributing the water of Diamond Valley “pursuant to the order of determination or under and pursuant to the decree of the court.” NRS 533.220(1).

For these reasons, the State Engineer respectfully requests a stay of the Order Granting Partial Summary Judgment as well as a stay of the entirety of the

district court adjudication proceedings to get clarification on these issues from this Court.³ This stay will prevent the district court and all parties from expending additional time and resources on the adjudication proceedings that are potentially subject to reversal.

The State Engineer requests immediate action on this Emergency Motion because Solarljøs, LLC, based on the Order Granting Partial Summary Judgment, could start immediately making use of water that exceeds that granted in the Order of Determination, which was awarded through the procedures the State Engineer

³ The State Engineer sought this relief first in the district court, and such relief was denied in an order entered February 24, 2022. *See* District Court’s Order Denying State Engineer’s Motion for Stay of Corrected Order Granting Solarljøs, LLC’s Motion for Partial Summary Judgment Pending Appeal; Order Denying Motion for Stay of Entirety of These Adjudication Proceedings Pending Appeal (“Order Denying Motion for Stay”), attached hereto as Exhibit 7. The district court now states it is going to issue a single decree moving forward, as opposed to separate decrees as it did for Solarljøs, LLC. Exhibit 7, pp. 8–9. However, the district court again states that “if no discovery were allowed, the evidentiary hearing under NRS 533.170 would be relegated to trial by ambush.” *Id.*, p. 6. This conflicts with the plain language of NRS 533.170 that requires exceptions to the Order of Determination to be filed a mere 5 days before the hearing on exceptions, and is indicative of the State Engineer’s concerns with the procedures used at the district court. Further, the State Engineer did not waive his procedural arguments as he made them known to the district court and all parties at a hearing held on August 25, 2020, prior to the issuance of the district court’s December 10, 2020, order regarding case procedures. Lastly, while the State Engineer does not waive his argument that dispositive motions are inappropriate in statutory adjudication proceedings, the motion for summary judgment at issue in *In re Determination of Relative Rights in and to Waters of Franktown Creek, Washoe Cty.*, was filed by Marlette Lake Company and opposed and appealed by Franktown Creek Irrigation Company, Inc., 77 Nev. 348, 350, 364 P.2d 1069, 1071 (1961). That was a dispositive motion between adverse water users, not a unilateral dispositive motion against the State Engineer’s Order of Determination. *Id.*

challenges in his appeal. Further, there are upcoming hearings on other exceptions scheduled for March 3–4, 2022, March 8–10, 2022, and continuing for 2 to 3 days each week through the second to last week of April 2022. These upcoming hearings threaten to compound the procedural concerns that the State Engineer raises in this appeal. Further, the district court’s order denying the State Engineer’s Motion for Stay brings into direct question what the State Engineer’s role should be in these upcoming hearings. *See* Exhibit 7.

II. ARGUMENT

A. This Court Should Stay the Operation of the Order Granting Partial Summary Judgment to Solarljós, LLC and Should Stay the Diamond Valley Adjudication Pending Appeal

The State Engineer seeks to preserve the status quo as set out in his Order of Determination during the pendency of this appeal, while also seeking to reserve the resources of the parties and the district court while he seeks clarification from the Supreme Court on the procedures utilized in this adjudication for all claimants that resulted in the appealed order specifically related to Solarljós, LLC, pursuant to NRAP 8.

In this case, the first factor regarding the potential defeat of the object of the State Engineer’s appeal should hold substantial weight. NRAP 8(c)(1). “Water in Nevada belongs to the public and is a precious and increasingly scarce resource.” *Bacher v. State Eng’r*, 122 Nev. 1110, 1116, 146 P.3d 793, 797 (2006). The State

Engineer and his office put decades of effort into this adjudication, culminating in his Order of Determination quantifying the prestatutory vested water claims in Diamond Valley and their associated dates of priority. As is apparent from prior litigation in this area, Diamond Valley is one of the most overappropriated and overpumped groundwater basins in the State. *See, e.g., Diamond Nat. Res. Prot. & Conservation Ass'n, et al. v. Diamond Valley Ranch, LLC, et al.*, Nevada Supreme Court Case No. 81224. In addition to the district court's Order Granting Partial Summary Judgment thereby approving Solarljøs, LLC's exceptions to the Order of Determination, there are other hearings on exceptions that have been completed, and others that are scheduled to occur imminently.

This appeal seeks to maintain the status quo (*i.e.*, distribution of water pursuant to the Order of Determination) while this Court reviews the district court's Order Granting Partial Summary Judgment and the procedures used to reach that point. If this stay is denied, the object of the State Engineer's appeal will be defeated as the State's scarce water resources will be distributed to Solarljøs, LLC in contravention of the State Engineer's Order of Determination and despite the State Engineer's concerns that the district court used improper procedures to grant their exception. Further, the other proceedings in this adjudication have utilized an identical procedure, and therefore to the extent the State Engineer's appeal is successful, these errors could be compounded should

this adjudication continue to move forward at the district court while this appeal is pending. While the district court ultimately disagreed with the State Engineer's Order of Determination and granted Solarljós, LLC's exception, the State Engineer respectfully requests that this Court stay that order as well as the entirety of these adjudication proceedings so that water can continue to be divided pursuant to the Order of Determination while this appeal is pending; otherwise, the object of the appeal will be defeated.

Furthermore, the State Engineer and the State of Nevada as a whole will suffer serious, potentially irreparable, harm should this stay not issue. First, without a stay, should the Supreme Court ultimately reverse the district court's order and direct the district court to alter its procedure moving forward with the adjudication, Solarljós, LLC could make use of the scarce water of Diamond Valley in excess of their right to do so. Second, this potentially irreparable harm to the State of Nevada could be compounded should the district court continue to rule on now-submitted exceptions or yet-to-be-heard exceptions, all of which have followed the same procedures that the State Engineer now challenges on appeal. The water of all sources of supply within the boundaries of the State of Nevada belongs to the public, and the citizens of this State risk being irreparably harmed if these waters are distributed incorrectly.

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Conversely, Solarljios, LLC and the other claimants in this adjudication will not suffer serious or irreparable harm if this stay is granted. There is no irreparable harm caused by waiting a short time longer to receive clarification from the Nevada Supreme Court, especially considering that these adjudication proceedings have been going, off and on, since 1982, and no parties to this adjudication requested that the operation of the Order of Determination be stayed pursuant to NRS 533.235. *See* Order of Determination, p. 4. The Nevada Supreme Court has held that delays or increased costs do not constitute irreparable harm. *See Mikohn Gaming Corp. v. McCrea*, 120 Nev. 248, 253, 89 P.3d 36, 39 (2004). Should the State Engineer not succeed on appeal, then Solarljios, LLC can use the water to which it would then be entitled, and in the meantime can use its water pursuant to the Order of Determination. Thus, entering this stay would not result in serious or irreparable harm to any non-moving parties.

Lastly, regarding the likelihood of success on the merits, the Supreme Court has held that where the object of an appeal will be defeated if the stay is denied, a stay is generally warranted; however, “the party opposing the stay motion can defeat the motion by making a strong showing that appellate relief is unattainable” particularly where “the appeal appears frivolous or if the appellant apparently filed the stay motion purely for dilatory purposes.” *Id.*, 120 Nev. at 253, 89 P.3d at 40. Here, the water law is unique, such that it provides the State Engineer with a right

of appeal in water adjudications. NRS 533.200 (“Appeals from such decree may be taken to the appellate court of competent jurisdiction pursuant to the rules fixed by the Supreme Court pursuant to Section 4 of Article 6 of the Nevada Constitution by the State Engineer...”). Further, the State Engineer is appealing the district court’s order, and seeking this stay, in good faith, seeking to ensure that the State’s water resources are used only to the extent that they were put to beneficial use prior to the adoption of Nevada’s water statutes.

In adjudications, “[t]he ultimate findings of the [S]tate [E]ngineer are entitled to great respect” and the State Engineer’s appeal will focus on his position that the district court has not treated his findings accordingly. *See Scossa v. Church*, 43 Nev. 407, 187 P. 1004, 1005 (1920). Additionally, the procedures laid down by the water law are “special in character, and the provisions of such law not only lay down the method of procedure but strictly limits it to that provided.” *See Application of Filippini*, 66 Nev. at 27, 202 P.2d at 540. The State Engineer’s appeal intends to argue that this adjudication has strayed from these mandatory provisions. Based on this, the State Engineer believes he has a high likelihood of success on the merits. In any event, this factor should not be given as much weight at this stage of the case as the others that clearly weigh in favor of this requested stay.

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III. CONCLUSION

Here, the State Engineer is appealing the district court's Order Granting Partial Summary Judgment, as certified final per the order granting Solarljós, LLC's NRCP 54(b) motion. However, the purpose of this appeal will be defeated if the operation of the Order of Determination is not enforced during the pendency of the appeal. It is also likely that the State Engineer, and the State of Nevada as a whole, will suffer serious, irreparable injury due to potential use of Nevada's water resources in excess of the parties' entitlements to do so, and that this error will likely be compounded as the additional determinations are made with respect to other claimant's vested claims. Therefore, and based on the foregoing, the State Engineer respectfully requests that this Court grant this Motion and stay both the order granting partial summary judgment and the entirety of the adjudication proceedings in Diamond Valley pending the State Engineer's appeal.

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Lastly, given the emergency nature of this Motion and aforementioned concerns regarding upcoming hearings and potential water use, the State Engineer respectfully requests a temporary administrative stay pending the briefing and decision on this Motion for Stay.

RESPECTFULLY SUBMITTED this 25th day of February, 2022.

AARON D. FORD
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NRAP 27(e) CERTIFICATE

I, James N. Bolotin, declare as follows:

1. I am currently employed by the Nevada Office of the Attorney General as a Senior Deputy Attorney General. I am counsel for Appellant named herein.

2. I verify that I have read the foregoing Emergency Motion Under NRAP 27(e) for Stay of District Court's Corrected Order Granting Solarljós, LLC's Motion for Partial Summary Judgment and Stay of Adjudication Proceedings Pending Appeal and Request for Temporary Stay Pending Decision on Underlying Motion for Stay ("Motion for Stay"), and that the same is true of my own knowledge, except for matters stated on information and belief, and as to those matters, I believe them to be true.

3. The facts showing the existence and nature of the emergency are set forth in the Motion for Stay. As described above, relief is needed as soon as possible to avoid defeating the purpose of the State Engineer's appeal and to avoid potentially irreparable harm to the State Engineer and the State of Nevada as a whole. There are additional hearings related to other portions of the adjudication scheduled starting next week on March 3, 2022, and therefore immediate action is requested.

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4. The relief sought in this Motion was presented to the district court in a motion filed with the district court February 9, 2022. The district court denied this relief, filing its order on February 24, 2022. The State Engineer is filing this Motion for Stay at the earliest possible time in light of these events.

5. I have made every practicable effort to notify the Supreme Court and other counsel in this case of the filing of this Motion. The State Engineer alerted other counsel to the filing of this Motion shortly before it was submitted for efilng. I also called the Clerk of Court's Office for the Nevada Supreme Court before filing. A courtesy copy was emailed to all parties.

6. Below are the telephone numbers and office addresses of the known participating attorneys:

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Executed this 25th day of February, 2022, in Carson City, Nevada.

/s/ James N. Bolotin
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CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General and that on this 25th day of February, 2022, I served a copy of the foregoing EMERGENCY MOTION UNDER NRAP 27(e) FOR STAY OF DISTRICT COURT'S CORRECTED ORDER GRANTING SOLARLJOS, LLC'S MOTION FOR PARTIAL SUMMARY JUDGMENT AND STAY OF ADJUDICATION PROCEEDINGS PENDING APPEAL AND REQUEST FOR TEMPORARY STAY PENDING DECISION ON UNDERLYING MOTION FOR STAY, by the Nevada Supreme Court's EFlex Electronic Filing System, addressed to:

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