

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

Respondents.

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Elizabeth A. Brown
Clerk of Supreme Court

**VENTURACCI'S JOINDER TO IRA R. RENNER AND MONTIRA
RENNER'S OPPOSITION TO STATE ENGINEER'S MOTION TO
DETERMINE WHETHER DISTRICT COURT PROPERLY CERTIFIED
CORRECTED ORDER GRANTING SOLARLJOS, LLC'S MOTION FOR
PARTIAL SUMMARY JUDGMENT AS FINAL PURSUANT TO NRCP**

54(B)

Respondents DANIEL S. VENTURACCI and AMANDA L. VENTURACCI (“Venturacci”), by and through their counsel of record, PAUL G. TAGGART, ESQ., and TIMOHTY D. O’CONNOR, ESQ., of the law firm TAGGART & TAGGART, LTD., hereby file this Joinder in Ira R. Renner And Montira Renner’s Opposition To State Engineer’s Motion To Determine Whether District Court Properly Certified Corrected Order Granting Solarljios, LLC’s Motion For Partial Summary Judgment As Final Pursuant To Nrcp 54(B) filed on March 4, 2022, in the above-titled action. Venturacci joins in the arguments made by Ira and Montira Renner.

CONCLUSION

Accordingly, Venturacci respectfully request the Court decline to issue the requested temporary administrative stay and instead conduct briefing on the State Engineer Motion for Stay in conformance with the applicable provisions of NRAP.

Respectfully submitted this 4thth day of March 2022.

TAGGART & TAGGART, LTD.

By: /s/ Timothy D. O’Connor

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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 document using the Nevada Supreme Court's E-Flex electronic filing system to the following parties:

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DATED this 4th day of March 2022.

/s/ Chloe Gouldman-Gainey
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