

Electronically Filed
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Elizabeth A. Brown
Clerk of Supreme Court

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.

Supreme Court No. 84275
District Court Case No. CV-2002009

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

Appellants,

v.

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.

SOLARLJOS, LLC'S JOINDER TO SADLER RANCH, LLC'S RESPONSE TO STATE ENGINEER'S EMERGENCY MOTION FOR STAY

Respondent SOLARLJOS, LLC ("Solarljios") by and through its attorneys of record, Alex J. Flangas and August B. Hotchkin of the law firm Kaempfer Crowell, hereby joins in the Response of Sadler Ranch, LLC ("Sadler") as the State Engineer has not established grounds for a stay, especially in that the State will not suffer any irreparable harm should this matter simply proceed as a regular appeal. The State has failed to establish any of the required elements, and the injury that will befall Solarljios is significant in comparison to the complete lack of injury to the State if the stay is denied and the appeal simply proceeds as a normal appeal.

To allow the State Engineer to attack the entire procedure utilized by the parties and the State Engineer now, more than a year and a half after it was initially

commenced, and somehow contend that this constitutes “an emergency” would turn the process on its head. Moreover, as was explained by Solarljøs in its opposition, Solarljøs did not avail itself of any of the allegedly improper procedures of which the State Engineer now argues (e.g., discovery, depositions, subpoenas to State witnesses, etc.). The State’s Motion should be denied.

Respectfully submitted this 8th day of March, 2022.

KAEMPFER CROWELL

BY: /s/ Alex J. Flangas
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CERTIFICATE OF SERVICE

I hereby certify that on March 8, 2022, service of the foregoing **SOLARLJOS, LLC'S JOINDER TO SADLER RANCH, LLC'S RESPONSE TO STATE ENGINEER'S EMERGENCY MOTION FOR STAY** was filed electronically with the Clerk of the Court, and therefore electronic service was made in accordance with the master service list to the following:

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DATED March 8, 2022

/s/ Sharon Stice

An employee of Kaempfer Crowell