

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 ND ELKO COUNTIES,
NEVADA.

Electronically Filed
Mar 11 2022 04:37 p.m.
Elizabeth A. Brown
Clerk of Supreme Court
Case 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; AND EUREKA COUNTY,

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; 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 GLADYS
GOICOECHEA,

Respondents.

/

DECLARATION OF KAREN A. PETERSON, ESQ.

The undersigned, KAREN A. PETERSON, ESQ., does hereby certify and declare as follows:

1. I am an attorney and partner at ALLISON MacKENZIE, LTD., one of the attorneys for Appellant, EUREKA COUNTY, in the above entitled matter.
2. On March 4, 2022, numerous parties to this appeal filed responses to the State Engineer's stay and jurisdictional motions.
3. NRAP 27(d)(2) provides a reply to a response shall not exceed five pages. EUREKA COUNTY decided to file a single Joinder to reply to matters raised by the responses filed March 4, 2022.
4. EUREKA COUNTY diligently edited its Joinder in an attempt to comply with the five page reply limitation, however, the information and additional arguments provided in the Joinder have caused the Joinder to exceed the 5 page

limitation. EUREKA COUNTY's Joinder is less than 10 pages, the combined page limitation total of two replies.

5. Based on the foregoing and the Motion filed herewith, EUREKA COUNTY respectfully requests permission to file its single Joinder consisting of 8 pages, exclusive of the signature page and certificate of service.

IN WITNESS WHEREOF, the undersigned, KAREN A. PETERSON, ESQ., has hereunto set her hand this 11th day of March, 2022.

/s/ Karen A. Peterson

KAREN A. PETERSON, NSB 366

CERTIFICATE OF SERVICE

Pursuant to NRAP 25(1)(c), I hereby certify that I am an employee of ALLISON MacKENZIE, LTD., Attorneys at Law, and that on this date, I caused the foregoing document to be served on all parties to this action by:

✓ Court's electronic notification system as follows:

James Bolotin
Timothy O'Connor
Gordon DePaoli
Laura Schroeder
David Rigdon
Aaron Ford
Alex Flangas
Therese Ure
Paul Taggart
Tamara Thiel
August Hotchkin
Ian Carr
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✓ U.S. First Class Mail

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Boise, Idaho 83702

DATED this 11th day of March, 2022.

/s/ Nancy Fontenot
NANCY FONTENOT