

**STATE OF NEW MEXICO
COUNTY OF SAN JUAN
ELEVENTH JUDICIAL DISTRICT**

**STATE OF NEW MEXICO, *ex rel.*
STATE ENGINEER,**

Plaintiff,

v.

**THE UNITED STATES OF AMERICA,
et al.,**

Defendants,

CV-75-184

**HON. JAMES J. WECHSLER
PRESIDING JUDGE**

**SAN JUAN RIVER
ADJUDICATION**

**Claims of Navajo Nation
Case No: AB-07-1**

**SETTLEMENT MOTION
OF UNITED STATES, NAVAJO NATION AND STATE OF NEW MEXICO
FOR ENTRY OF PARTIAL FINAL DECREES**

The United States of America (“United States”), the Navajo Nation (“Navajo Nation”) and the State of New Mexico *ex rel.* State Engineer (“State”) (collectively “Settling Parties”) hereby submit this Settlement Motion for Entry of Partial Final Decrees (“Settlement Motion”), pursuant to the Court’s Order Establishing Initial Procedures for Entry of a Partial Final Judgment and Decree of the Water Rights of the Navajo Nation, filed August 19, 2010 (“Procedural Order”).

Pursuant to the Northwestern New Mexico Rural Water Projects Act of 2009 (Public Law 111-11; 123 Stat. 1367), the Settlement Parties on December 17, 2010 executed the revised San Juan River Basin in New Mexico Navajo Nation Water Rights Settlement Agreement, which is attached hereto as Exhibit No. 1 (“Settlement Agreement”). The Settlement Agreement includes three appendices: Appendix 1 is the proposed Partial Final Judgment and Decree of the Water

Rights of the Navajo Nation (“Partial Final Decree”); Appendix 2 is the Proposed Supplemental Partial Final Judgment and Decree of the Water Rights of the Navajo Nation (“Supplemental Partial Final Decree”); and Appendix 3 contains Waivers and Releases of claims.

WHEREFORE, in accordance with the expedited *inter se* procedures set forth in the Procedural Order, the Settling Parties request the Court consider and then enter the Partial Final Decree and Supplemental Partial Final Decree, thereby finally adjudicating the Navajo Nation’s water rights in the San Juan River Basin in New Mexico.

Respectfully submitted this 29th day of December 2010.

NAVAJO NATION

Electronically Approved

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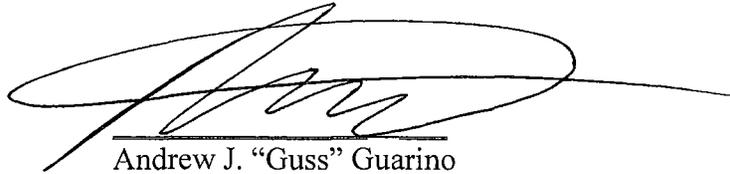
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CERTIFICATE OF SERVICE

Pursuant to the Procedural Order (page 12, subsection II.A), I hereby certify that a true and accurate PDF copy of this *Settlement Motion for Entry of Partial Final Decrees* was served this 29th day of December 2010 to counsel listed on Attachment "A."



Andrew J. "Guss" Guarino

Attachment A

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