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January 25, 2019

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*Via Electronic Mail [kgeddes@water.nv.gov](mailto:kgeddes@water.nv.gov)*

Kristen Geddes  
Chief, Hearing Section  
Office of the Nevada State Engineer  
901 S. Stewart Street, #2002  
Carson City, Nevada 89701

Re: **Diamond Valley Adjudication – Notice of Hearing on Objections  
Our File No. 21904.0001**

Dear Kristen:

Since we have not been able to connect by telephone, I am writing this letter to explain what I was calling you about. We represent the Bailey Family Trust in the Diamond Valley Adjudication. The hearing on their Objections has been scheduled for a 1/2 day on February 11, 2019. I am respectfully requesting that the 1/2 day hearing for the Bailey Trust be moved to the end of the hearing process, March 1, 2019, if at all possible.

I am making this request because of our involvement on behalf of the Walker River Irrigation District in the proceedings in the Nevada Supreme Court concerning the Walker River-Walker Lake and the Public Trust Doctrine. That case and the issues it presents are of extreme importance to the District and all of Nevada. The Walker River Irrigation District's Answering Brief in that matter is due to be filed on or before March 26, 2019.

In addition, when it became public knowledge that the Nevada Supreme Court would hear the questions certified to it by the Ninth Circuit concerning the Walker River and Walker Lake, the American Bar Association requested that I participate on a panel at the 2019 ABA Water Law Conference in Denver, Colorado, concerning "The Walker River-Walker Lake Litigation: The Public Trust Doctrine in Nevada." The other participants on that panel are all familiar with the litigation, and are Simeon Herskovits, Lisa Heki and Barbara Cosens. I accepted that request in August of 2018. As a result, I am required to have a draft of my paper submitted to the moderator, Barbara Cosens, by February 9th, and my final paper must be submitted to the American Bar Association on February 22nd.

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Chief, Hearing Section  
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Although the ABA paper and the Walker River Irrigation District Answering Brief involve the same topics, they each require a different approach both in form and substance. I am first working very hard and diligently to meet the deadlines for the ABA paper, and after that is done, I will shift gears and begin work on the Nevada Supreme Court Answering Brief. It will be difficult for me to meet the ABA deadlines if I must also prepare for the hearing on February 11, 2019. Therefore, I respectfully request that the 1/2 day for the Bailey Family Trust be moved to the end of the hearing schedule. I would appreciate any consideration you can give to this request. If you require a formal motion, please advise.

Sincerely,

  
Gordon H. DePaoli

GHD/hd