

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

THE STATE OF NEW MEXICO,	§	
THE NAVAJO NATION,	§	
and THE ZUNI TRIBE,	§	Case No. 1:22-cv-00225
	§	
Plaintiffs,	§	
	§	
v.	§	
	§	
THE UNITED STATES OF AMERICA	§	
AND THE UNITED STATES ARMY	§	
	§	
Defendants	§	
	§	

**JOINT NOTICE OF LODGING OF PROPOSED CONSENT DECREE
AND MOTION TO STAY FURTHER PROCEEDINGS
PENDING PUBLIC NOTICE AND COMMENT**

Plaintiffs the State of New Mexico, the Navajo Nation, and the Zuni Tribe (collectively “Plaintiffs”) and Defendants the United States of America and the United States Army (collectively “Defendants” or the “United States”) hereby lodge with the Court a proposed settlement for this matter, in the form of a Consent Decree, attached hereto. The proposed Decree would resolve the Complaint that commenced this case, in which Plaintiffs seek from Defendants sums sufficient to cure injury to certain natural resources in which Plaintiffs have trusteeship interests.

Though the proposed Decree has been executed by the parties, the Plaintiffs have agreed to subject the proposed Decree to a public notice-and-comment process as summarized below, before it is considered by the Court. Publication of notice of the proposed settlement is being arranged. The public will be given at least 30 days within which to submit any comment on the

proposed Decree. The Plaintiffs will keep the Court and Defendants advised on the status of the public comment process.

Accordingly, all parties jointly move that the Court stay further proceedings in this matter until the public comment process is complete, after which the parties will move the Court to enter the consent decree or take other appropriate action. A proposed order is attached.

Respectfully,

FOR THE NEW MEXICO NATURAL
RESOURCES TRUSTEE

/s/ William Grantham

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