

STATE OF NEW MEXICO  
COUNTY OF HIDALGO  
SIXTH JUDICIAL DISTRICT

STATE OF NEW MEXICO <i>ex rel.</i>	)	No. D-623-CV 2005-00054
NEW MEXICO STATE ENGINEER,	)	Honorable J.C. Robinson, Presiding Judge
	)	
Plaintiff,	)	ANIMAS UNDERGROUND WATER
vs.	)	BASIN ADJUDICATION
	)	
ROSETTE, INC., <i>et al.</i> ,	)	Subfile No.: Various
	)	
Respondents.	)	Claimant:
	)	J & C VICTOR 2006 TRUST

**J&C VICTOR 2006 TRUST’S UNOPPOSED MOTION TO EXTEND DEADLINE  
TO FILE A REPLY TO STATE’S RESPONSE  
TO J&C VICTOR 2006 TRUST’S MOTION TO SET ASIDE  
DEFAULT JUDGMENT PURSUANT TO RULE 55 AND RULE 60(B)(6) NMRA**

**COMES NOW**, Respondent J&C Victor 2006 Trust (“Respondent”) and hereby moves this Court for an extension of the deadline for Respondent to file its Reply to Plaintiff State of New Mexico’s (“State”) Response to Motion to Set Aside Default Judgment Pursuant to Rule 55 and Rule 60(B)(6) NMRA (October 26, 2018). In support thereof, Respondent states as follows:

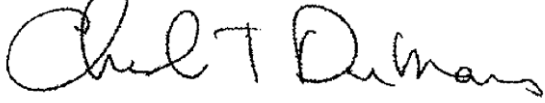
1. The State served its Response to Respondent’s Motion to Set Aside on October 26, 2018;
2. Respondent’s Reply in Support of its Motion to Set Aside is due on November 13, 2018;
3. Counsel for Respondent has conferred with Counsel for the State and Counsel for the State does not oppose this Motion. The parties having stipulated that this Motion to Extend Deadline should be granted, it is therefore unopposed.

**WHEREFORE**, J&C Victor 2006 Trust respectfully requests that the Court extend the time to file its Reply to **November 30, 2018**.

Respectfully submitted,

LAW & RESOURCE PLANNING ASSOCIATES,

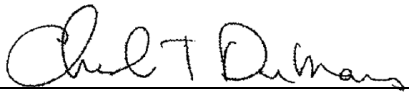
*A Professional Corporation*

By: \_\_\_\_\_

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Zachary Ogaz  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served to counsel of record, including counsel for Plaintiff State of New Mexico, via the Court's Odyssey File & Serve System this 1st day of November, 2018.

  
\_\_\_\_\_  
Charles T. DuMars