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**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

<i>In Re: SRBA</i>	)	
	)	
Case No. 39576	)	Subcase Nos: 67-15263 <i>et al.</i> (Hood)
	)	See Ex. A
	)	
	)	
_____	)	

**United States' Motion to Alter or Amend Special Master's Report
and Recommendation, Findings of Fact, and Conclusions of Law**

Pursuant to SRBA Administrative Order 1 ("AO1") § 13 and Idaho Rule of Civil Procedure 59(e), the United States Department of the Interior, Bureau of Land Management (the "United States" or "BLM") hereby moves to alter or amend the Special Master's Report and Recommendation, Findings of Fact, and Conclusions of Law filed in the above-captioned subcases on January 8, 2025. The basis of this motion is the United States' objection to the Special Master's recommendation of a priority date of April 1, 1911, for all twenty-seven water right claims asserted by Claimants Keith & Karen Hood (the "Hoods") on federal land managed by BLM. Additionally, the Special Master erred by not making findings as to the issues of quantity and forfeiture in relation to the priority date for the water right claims. Accordingly, for the reasons outlined in the accompanying brief in support of the motion, the United States

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requests that the Special Master amend its prior determinations and decree the Hoods' claims with priority dates of June 28, 1931, April 1, 1943, and April 1, 1975, based on their predecessors' first authorizations to graze the relevant portions of federal land. Further, the United States requests the Special Master make findings as to the issues of quantity and forfeiture in relation to the priority date for the water right claims.

Dated: February 28, 2025

Respectfully submitted,

Lisa Lynne Russell, Deputy Assistant Attorney General
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/s/ *Michelle Ramus*

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