

94

**DISTRICT COURT - PRBA**  
**Fifth Judicial District**  
**County of Twin Falls - State of Idaho**

**FEB 16 2023**

By \_\_\_\_\_ Clerk  
\_\_\_\_\_ Deputy Clerk

**DISTRICT OF TWIN FALLS**

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

**In Re PRBA**

**Subcase** 87-12053  
(Insert water right number)

# STANDARD FORM 7

**Case No. 59576**

☒ **MOTION TO FILE LATE OBJECTION**  
**OR**  
☐ **MOTION TO SET ASIDE AND MODIFY**  
**PARTIAL DECREE OR FINAL ORDER**  
**DISALLOWING WATER RIGHT CLAIM**

**NAME AND ADDRESS OF PERSON FILING MOTION FOR LATE OBJECTION OR  
MOTION TO SET ASIDE PARTIAL DECREE/FINAL ORDER DISALLOWING**

**Name:** Janice Geyer, Jez Ranch, LLC, John R. Ziemann, Van G. Ziemann, Ziemulz Farms, LLC

**Address:** 510 Highland View Dr., Boise, ID 83702

**Daytime Phone:** 208-343-3711

☐ I am an attorney representing \_\_\_\_\_

My name is Chris M. Bromley

My address is McHugh Bromley, PLLC  
380 S. 4th St., Ste. 103, Boise, ID 83702

My phone number is 208-287-0991

**CLAIMANT OF WATER RIGHT AS LISTED IN DIRECTOR'S REPORT OR  
PARTIAL DECREE/FINAL ORDER DISALLOWING**

**Name:** USA as Trustee on Behalf of the Nez Perce Tribe and Allottees of the Nez Perce Indian Res.

**Address:** Bureau of Indian Affairs, 911 N.E. 11th Ave., Portland, OR 97232

If you are seeking to file a late Objection, list the reason(s) this objection is late and why it was not filed by the Objection deadline:

Objectors have recently retained counsel and were unaware of the need to file a late objection in order to participate in this subcase that is a competing claim filed by the United States on behalf of the Nez Perce Tribe for 50% of a spring right claimed by Objectors, 87-11171.

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If you are seeking leave to file a late Objection,

**YOU MUST ATTACH A COMPLETED STANDARD FORM 1 (Objection form).**

If you are seeking to set aside and modify a Partial Decree/Final Order Disallowing, indicate the basis for your motion:

- ☐ Idaho Rule of Civil Procedure 59 (e)
- ☐ Idaho Rule of Civil Procedure 60(a)
- ☐ Idaho Rule of Civil Procedure 60(b)

And list the reason(s) why the Partial Decree/Final Order Disallowing should be set aside:

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(Signature of person filing motion)



(Attorney signing in representative capacity)

## INSTRUCTIONS FOR MAILING

You must mail this motion, to the Clerk of the court. **FAX filings will not be accepted.**  
You must also send a copy to all the parties listed below in the Certificate of Mailing.

## CERTIFICATE OF MAILING

I certify that on February 14, 2023, I mailed the original and copies of this motion, including all attachments, to the following persons:

1. Original to:

Clerk of the District Court  
Palouse River Basin Adjudication  
253 Third Avenue North  
PO Box 2707  
Twin Falls, ID 83303-2707

2. One copy to the each party involved in the Subcase including the claimant, all objectors, respondents and any party granted a motion to participate. Attach a list of names and addresses.

3. Copies to:

IDWR Document Depository  
PO Box 83720  
Boise, ID 83720-0098

United States Department of Justice  
Environment & Nat'l Resources Div  
550 W Fort Street, MSC 033  
Boise, ID 83724

Chief, Natural Resources Division  
Office of Attorney General  
State of Idaho  
PO Box 83720  
Boise, ID 83720-0010

USA as Trustee for the Nez Perce Tribe  
Bureau of Indian Affairs  
911 N.E. 11th Ave.  
Portland, OR 97232

Norman M. Semanko  
Parsons Behle & Lattimer  
800 W. Main St., Ste. 1300  
Boise, ID 83702

Michael P. Lawrence  
Charlie S. Baser  
Givens Pursley LLP  
601 W. Bannock St.  
Boise, ID 83702



Signature of Movant or attorney  
mailing on Movant's behalf