

JAN 23 2026

**ADAM R.F. GUSTAFSON**  
Principal Deputy Assistant Attorney General  
**EMMI BLADES**  
**HILLARY HOFFMAN**  
Trial Attorneys  
U.S. Department of Justice  
Environment & Natural Resources Division  
Tribal Resources Section  
P.O. Box 7611  
Ben Franklin Station  
Washington, D.C. 20044-7611  
Phone: (202) 598-0661 (Blades)  
Phone: (202) 598-3147 (Hoffman)  
Fax: (202) 353-1156  
Emmi.blades@usdoj.gov  
Hillary.hoffman@usdoj.gov

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

*Attorneys for the United States*

**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**

**CASE NO: 59576**

)  
) **SUBCASE NO. 87-12006**  
)  
) **UNITED STATES' MOTION TO**  
) **WITHDRAW CLAIM IN SUBCASE**  
) **NO. 87-12006**  
)  
)  
)

On December 12, 2025, the Court issued an *Order on Stipulation to Stay* setting litigation deadlines in this matter, including a December 19, 2025, deadline for Claimants' supplemental reports regarding springs. The United States' supplemental report disclosed December 19, 2025, recommends withdrawing the spring claim in subcase no. 87-12006 based on information obtained by the United States' expert consultant during a site visit. With this information about the water source that is the subject of claim no. 87-12006, the United States no longer wishes to

maintain, and now moves to withdraw, this claim.

### NOTICE OF HEARING


By Notice dated January 16, 2026, there is a status conference in subcase no. 87-12006 scheduled for February 25, 2026 at 9:00 am (PT). The United States requests that the hearing on this motion shall take place at the same time before Special Master Brigitte Bilyeu at the following location:

IDAHO WATER ADJUDICATION COURT  
253 3RD AVE, NORTH  
TWIN FALLS, ID 83301

Parties may participate electronically by zoom or telephone for the hearing by navigating to <http://zoom.us/join> and entering in Meeting ID 914 3890 3586, Password 010574 or dialing (877) 853-5247 and entering in Meeting ID 914 3890 3586, Password 010574. For questions regarding electronic participation, please contact the Court Clerk's office at (208) 736-3011.

DATED this 22nd day of January 2026.

Respectfully submitted,  
Adam R.F. Gustafson  
Principal Deputy Assistant Attorney General



---

Emmi Blades  
Hillary Hoffman  
Trial Attorneys, Tribal Resources Section  
Environment & Natural Resources Division  
United States Department of Justice

## CERTIFICATE OF SERVICE

I certify that an original copy of the *United States' Motion to Withdraw Claim in Subcase No. 87-12006* was sent via Fax Filing this 22nd day of January 2026 to:

Clerk of the District Court, Twin Falls County  
Palouse River Basin Adjudication  
253 Third Avenue North  
Twin Falls, ID 83303

I certify that true and correct copies of the document listed above were sent via electronic mail and/or U.S. Post to the parties below on this 22nd day of January 2026.

### STATE OF IDAHO

Represented by:  
Chief Natural Resources Division  
Office of the Attorney General  
PO BOX 83720  
Boise, ID 83720-0010  
[Scott.Campbell@ag.idaho.gov](mailto:Scott.Campbell@ag.idaho.gov)  
[joy.vega@ag.idaho.gov](mailto:joy.vega@ag.idaho.gov)  
[David.Perkins@ag.idaho.gov](mailto:David.Perkins@ag.idaho.gov)  
[Rowdy.keller@ag.idaho.gov](mailto:Rowdy.keller@ag.idaho.gov)

### NEZ PERCE TRIBE OF THE UNITED STATES OF AMERICA

Represented by:  
Michael A. Lopez  
Nez Perce Tribe Legal Counsel  
100 Agency Rd.  
Lapwai, ID 83540  
[mlopez@nezperce.org](mailto:mlopez@nezperce.org)

### NEZ PERCE TRIBE OF THE UNITED STATES OF AMERICA

Represented by:  
Thomas L. Murphy  
Steven C. Moore  
Native American Rights Fund  
250 Arapahoe Ave  
Boulder, CO 80302  
[murphy@narf.org](mailto:murphy@narf.org)

Norman M. Semanko  
Parsons Behle & Latimer  
800 W. Main Street, Ste 1300  
Boise, ID 83702  
[NSemanko@parsonsbehle.com](mailto:NSemanko@parsonsbehle.com)

Michael P. Lawrence  
Charlie S. Baser  
601 W. Bannock St.  
Boise, ID 83701  
[mpl@givenspursley.com](mailto:mpl@givenspursley.com)  
[charliebaser@givenspursley.com](mailto:charliebaser@givenspursley.com)

Director of IDWR  
P.O. Box 83720  
Boise, ID 83720  
courtesy e-mail:  
[Lacey.rammell-obrien@idwr.idaho.gov](mailto:Lacey.rammell-obrien@idwr.idaho.gov)



---

Emmi Blades