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

IN RE: PRBA

CASE NO. 59576

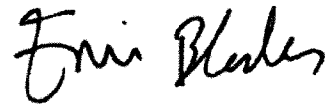
)
) Subcase Nos. 87-12015
) and 87-12088
)
) **UNITED STATES'**
) **MOTION TO AMEND CLAIMS**
)

The United States of America, as Trustee for the Nez Perce Tribe ("Tribe") of the Nez Perce Indian Reservation and individual Indian allottees, hereby moves this Court to amend the Notices of Claims for Subcase Nos. 87-12015 and 87-12088, which are both springs and fountains claims. This Motion is filed pursuant to the *Order on Motion to Enter Litigation Schedule for Federal Claims*, dated December 12, 2024, and the *Order on Stipulation to Stay*, dated December 12, 2025, and is supported by the *Memorandum in Support of United States' Motion to Amend Claims*, filed herewith ("Memorandum"). For the reasons explained in the

Memorandum, there is good cause for the amendments, and justice requires both claim numbers listed above be amended to proceed to entitlement and quantification.

DATED this 29th day of January 2026.

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

A handwritten signature in black ink, reading "Emmi Blades". The signature is written in a cursive, flowing style.

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 Amend Claims* was sent via FedEx this 29th 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 29th 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
joy.vega@ag.idaho.gov
David.Perkins@ag.idaho.gov
Rowdy.keller@ag.idaho.gov

Norman M. Semanko
Parsons Behle & Latimer
800 W. Main Street, Ste 1300
Boise, ID 83702
NSemanko@parsonsbehle.com

Michael P. Lawrence
Charlie S. Baser
601 W. Bannock St.
Boise, ID 83701
mpl@givenspursley.com
charliebaser@givenspursley.com


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

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

NEZ PERCE TRIBE OF THE UNITED STATES OF AMERICA

Represented by:
Thomas L. Murphy
Native American Rights Fund
250 Arapahoe Ave
Boulder, CO 80302
murphy@narf.org



Emmi Blades