

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

FEB 04 2026

By _____

J.C. Clerk
Deputy Clerk

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**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)
) Subcase Nos. 87-12015
) and 87-12088
)
CASE NO. 59576) **UNITED STATES'**
) **MOTION TO AMEND CLAIMS**
)

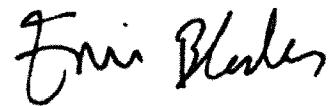
The United States of America, as Trustee for the Nez Perce Tribe ("Tribe") of the Nez Perce Indian Reservation and individual Indian allottees, hereby moves this Court to amend the Notices of Claims for Subcase Nos. 87-12015 and 87-12088, which are both springs and fountains claims. This Motion is filed 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



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.

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