

My name is United States of America, as trustee on behalf of the Nez Perce Tribe and
Allottees of the Nez Perce Indian Reservation acting through Regional Director,
Northwest Region Department of the Interior, Bureau of Indian Affairs

My address is 911 N.E. 11th Avenue, Portland, OR 97232

My phone number is: work _____ Home _____



I am an attorney representing United States BIA/DOI

My name is Emmi Blades

My address is P.O. Box 7611 Ben Franklin Station
Washington, D.C. 20044-7611

My phone number is 202-598-0661



I did not file a Notice of Claim to the use of water in the PRBA because:

This spring was originally thought to be part of a multisource spring and was identified as
part of Subcase No. 87-12015 (Fed ID 1010). A site visit occurred in October 2025 and
uncovered that this spring is distinct from the other spring identified in 87-12015. This
spring therefore requires its own Notice of Claim.



I filed a Notice of Claim and elected to defer judicial proceedings on my domestic or stock watering use. I desire to reinstate my Notice of Claim for domestic or stock watering use.



I am providing legal and factual documentation for my claimed use of water. You must describe these documents and attach a readable copy. (You do not need to fill this out if you are reinstating a Notice of Claim for domestic or stock watering use, but you must attach a copy of your Notice of Claim.)

The factual and legal documentation of the spring is provided in the Notice of Claim for
Subcase No. 87-12406, and the corresponding Motion filed herewith.

A Motion to File Late Notice of Claim will require a hearing before the Presiding Judge.

Follow these instructions regarding the hearing on the motion.

1. Contact the Clerk of the PRBA Court at (208) 736-3011 to request a hearing date and time.
2. Fill in the following information:

This motion will be heard on April 21, 2026 at 2:00 p.m. (PT)
(insert date and time)
at the PRBA Courthouse, 253 Third Avenue North, Twin Falls, Idaho.

I have attached:

- A fully completed Notice of Claim (available from IDWR).
- A claim filing fee for a domestic and stock watering use. IDWR may charge this fee pursuant to I.C. §42-1414. To determine this amount, contact IDWR at (800) 451-4129. I have enclosed a check payable to: State of Idaho Department of Water Resources in the amount of \$_____.
- A claim filing fee and a late claim fee for those claims other than domestic or stock watering use for which a notice of claim was not filed. To determine this amount, contact IDWR at (800) 451-4129. I have enclosed a check payable to: State of Idaho Department of Water Resources in the amount of \$_____.

(Signature of person filing motion)

Eric Blakes

(Attorney signing in representative capacity)

INSTRUCTIONS FOR MAILING

You must mail the 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 January 29, 2026, 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. Copies to:

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

United States Department of Justice
Environment & Nat'l Resources Div
P.O. Box 7611
Ben Franklin Station
Washington, D.C. 20044-7611

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



Signature of Movant or attorney
mailing on Movant's behalf