

RECEIVED

JUN 24 2013

LEGAL
DEPT OF WATER RESOURCES

1 Law Offices of
2 Curtis, Goodwin, Sullivan,
3 Udall & Schwab, P.L.C.
4 501 East Thomas Road
5 Phoenix, Arizona 85012
6 Telephone (602) 393-1700
7 firm@cgsuslaw.com

8 William P. Sullivan, Esq. (#005956)
9 wsullivan@cgsuslaw.com

10 Attorneys for the City of Sierra Vista

11 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

12 IN AND FOR THE COUNTY OF MARICOPA

13 **IN THE GENERAL**
14 **ADJUDICATION OF ALL**
15 **RIGHTS TO USE WATER IN**
16 **THE GILA RIVER SYSTEM AND**
17 **SOURCE**

18 Case No. W1-11-2664
19 **INITIAL DISCLOSURE STATEMENT OF**
20 **THE CITY OF SIERRA VISTA**
21 (Special Master George A. Schade, Jr.)

22 CONTESTED CASE: In re Redfield Canyon Wilderness Area.

23 HSR INVOLVED: San Pedro River Watershed Hydrographic Survey Report.

24 DESCRIPTIVE SUMMARY: The City of Sierra Vista file its Initial Disclosure Statement
25 pursuant to Arizona Rule of Civil Procedure 26.1 and the Special Master's Case Initiation
Order and Designation of Initial Issues for Briefing dated April 5, 2012, as modified by Order
dated January 17, 2013.

STATEMENT OF CLAIMANT NUMBERS: 39-1488-89; 39-2752; 39-5807; 39-7844-48;
39-2557-58 and 39-12469

NUMBER OF PAGES: 4

DATE OF FILING: June 21, 2013

The City of Sierra Vista ("Sierra Vista"), through undersigned counsel, files this
Initial Disclosure Statement, pursuant to Arizona Rule of Civil Procedure 26.1 and the

1 Special Master's Case Initiation Order and Designation of Initial Issues for Briefing dated
2 April 5, 2012, as modified by Order dated January 17, 2013 ("Scheduling Order").

3
4 **INITIAL DISCLOSURE STATEMENT**

5 Sierra Vista submits this Initial Disclosure Statement in compliance with the
6 Scheduling Order. At this time Sierra Vista does not anticipate taking an active role in this
7 contested case. Preparation of this contested case is ongoing and potentially relevant facts
8 and information may be discovered in the future. Sierra Vista reserves the right to move to
9 withdraw from this case and/or to revise, correct, or supplement this disclosure of information
10 and will do so as required under the Scheduling Order and other applicable orders or rules as
11 new and different information is discovered or revealed, or as Sierra Vista discovers that
12 additional information is relevant.
13

14 A. Preliminary Position on the Seven Issues

15 At this time Sierra Vista takes no position on the seven issues identified by the
16 Special Master's Scheduling Order.
17

18 B. The Factual Basis of a Party's Claim

19 At this time Sierra Vista takes no position on the seven issues identified by the
20 Special Master's Scheduling Order.
21

22 C. The Legal Theory Upon Which Each Claim is Based

23 At this time Sierra Vista takes no position on the seven issues identified by the
24 Special Master's Scheduling Order.
25

/ / /

1 D. The Names, Addresses, and Telephone Numbers of Witnesses
2 the Disclosing Party Expects to Call, Including Experts

3 At this time, Sierra Vista has not determined if it will call any witnesses to
4 testify on the seven designated issues. It is likely that much of this case will be presented on
5 Motion and then, if an evidentiary hearing is conducted, through examination of employees of
6 the United States.

7 E. The Names and Addresses of all Persons Who Have Given
8 Statements and of Persons Believed to Have Knowledge or
9 Information Relevant to the Seven Issues

10 Sierra Vista is presently unaware of any persons having knowledge or
11 information relevant to the seven issues identified in the Scheduling Order.

12 F. The Existence, Location, Custodian and General Description of
13 Tangible Evidence and Relevant Documents, including Voluminous
14 Documentary Evidence.

15 Sierra Vista has not conducted discovery on the seven issues identified by the
16 Scheduling Order. It anticipates that most of the documentation relevant to the seven issues is
17 in the possession, control or custody of the United States.

18 DATED this 21st day of June, 2013.

19 Curtis, Goodwin, Sullivan,
20 Udall & Schwab, P.L.C.

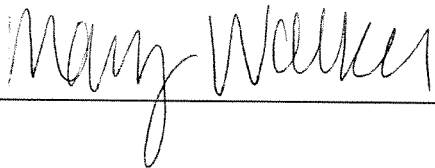
21 By 

22 William P. Sullivan, Esq.
23 501 E. Thomas Road
24 Phoenix, Arizona 85012
25 Attorneys for the City of Sierra Vista

1 Original of the foregoing filed this
21st day of June, 2013 with:

2 Clerk of the Maricopa County Superior Court
3 601 W. Jackson Street
4 Phoenix, Arizona 85003
5 Attention: Water Case

6 Copies of the foregoing mailed this 21st
7 day of June, 2013 to those parties who
8 appear on the Court-approved mailing list
9 for Case No. W1-11-2664 dated January 10, 2013.

10 
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25