## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO

NUCLEAR WATCH NEW MEXICO,	)
Plaintiff,	)
	)
V.	)
	)
UNITED STATES DEPARTMENT OF ENERGY	)
	)
and	)
	)
LOS ALAMOS NATIONAL SECURITY, LLC, Defendants,	)
Dejenuunis,	)
and	)
	)
NEW MEXICO ENVIRONMENT DEPARTMENT,	)
Intervenor.	)
	)

No. 1:16-CV-00433-JCH-SCY

## NEW WATCH MEXICO'S NOTICE *RE* MOTION FOR PARTIAL SUMMARY JUDGMENT ON THE ISSUE OF DEFENDANT DOE'S LIABILITY: BRIEFING IS CLOSED AND THE MATTER IS READY FOR DECISION

Pursuant to D.N.M.LR-Civ. 7.4(e), the Nuclear Watch New Mexico ("NWNM") hereby

certifies that NWNM's Motion for Partial Summary Judgment on Defendant DOE'S Liability is fully

briefed and ready for decision. The filings on this motions are as follows:

11/09/2018	<u>92</u>	First MOTION for Summary Judgment by Nuclear Watch New Mexico. (Block, Jonathan) (Entered: 11/09/2018)
11/09/2018	<u>93</u>	Memorandum in Support of Motion 92 with Exhibits by Nuclear Watch New Mexico.Modified text on 11/13/2018 (mjr). (Entered: 11/09/2018)
12/04/2018	108	NOTICE by Nuclear Watch New Mexico re 92 First MOTION for Summary Judgment (Attachments: # 1 Exhibit Corrected exhibit 93-1, # 2 Exhibit Corrected exhibit 93-2, # 3 Exhibit Corrected exhibit 93-3, # 4 Exhibit Corrected exhibit 93-4, # 5 Exhibit Corrected exhibit 93-5, # 6 Exhibit Corrected exhibit 93-6, # 7 Exhibit Corrected exhibit 93-7, # 8 Exhibit Corrected exhibit 93-8, # 9 Exhibit Corrected exhibit 93-9, # 10 Exhibit Corrected exhibit 93-10, # 11 Exhibit Corrected exhibit 93-11, # 12 Exhibit Corrected exhibit 93-12, # 13 Exhibit Corrected exhibit 93-13, # 14 Exhibit Corrected exhibit 93-14, # 15 Exhibit Corrected exhibit 93-15, # 16 Exhibit Corrected exhibit 93-16, # 17

		Exhibit Corrected exhibit 93-17, # <u>18</u> Exhibit Corrected exhibit 93-18, # <u>19</u> Exhibit Corrected exhibit 93-19, # <u>20</u> Exhibit Corrected exhibit 93-20, # <u>21</u> Exhibit Corrected exhibit 93-21, # <u>22</u> Exhibit Corrected exhibit 93-22, # <u>23</u> Exhibit Corrected exhibit 93-23, # <u>24</u> Exhibit Corrected exhibit 93-24, # <u>25</u> Exhibit Corrected exhibit 93-25, # <u>26</u> Exhibit Corrected exhibit 93-26, # <u>27</u> Exhibit Corrected exhibit 93-27, # <u>28</u> Exhibit Corrected exhibit 93-28, # <u>29</u> Exhibit Corrected exhibit 93-29, # <u>30</u> Exhibit Corrected exhibit 93-30, # <u>31</u> Exhibit Corrected exhibit 93-31, # <u>32</u> Exhibit Corrected exhibit 93-32, # <u>33</u> Exhibit Corrected exhibit 93-35, # <u>36</u> Exhibit Corrected exhibit 93-36, # <u>37</u> Exhibit Corrected exhibit 93-37, # <u>38</u> Exhibit Corrected exhibit 93-38, # <u>39</u> Exhibit Corrected exhibit 93-39, # <u>40</u> Exhibit Corrected exhibit 93-40, # <u>41</u> Exhibit Corrected exhibit 93-41, # <u>42</u> Exhibit Corrected exhibit 93-42, # <u>43</u> Exhibit Corrected exhibit 93-43, # <u>44</u> Exhibit Corrected exhibit 93-44, # <u>45</u> Exhibit Corrected exhibit 93-45, # <u>46</u> Exhibit Corrected exhibit 93-46, # <u>47</u> Exhibit Corrected exhibit 93-47, # <u>48</u> Exhibit Corrected exhibit 93-48, # <u>49</u> Exhibit Corrected exhibit 93-49) (Block, Jonathan) (Entered: 12/04/2018)
12/12/2018	<u>114</u>	RESPONSE in Opposition re <u>92</u> First MOTION for Summary Judgment filed by United States Department of Energy. (McDonough, Eileen) (Entered: 12/12/2018)
03/06/2019	<u>129</u>	REPLY to Response to Motion re <u>92</u> First MOTION for Summary Judgment filed by Nuclear Watch New Mexico. (Block, Jonathan) (Entered: 03/06/2019)

WHEREFORE, as the matter is completely submitted NWNM respectfully requests the

Court's decision on the motion.

Respectfully submitted:

## NUCLEAR WATCH NEW MEXICO

BY:

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Co-counsel for Plaintiff Nuclear Watch New Mexico

## **CERTIFICATE OF SERVICE**

On this 11th day of March 2019, I, Jonathan M. Block, caused the foregoing New Watch Mexico's Notice Re Motion For Partial Summary Judgment On The Issue Of Defendant Doe's Liability: Briefing Is Closed And The Matter Is Ready For Decision to be served on the parties of record in this proceeding using the CM/ECF electronic filing system.

Jonathan M. Block