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**IN THE HUALAPAI TRIBAL COURT  
HUALAPAI RESERVATION, STATE OF ARIZONA**

WD AT THE CANYON, LLC, an Arizona limited liability company, JAMES R. BROWN, a married man,	)	Case No. 2014-CV-005
	)	
Plaintiffs,	)	<b>SPECIALLY APPEARING</b>
	)	<b>RESPONDENTS' NOTICE OF MOTION</b>
	)	<b>AND MOTION TO DISMISS FOR LACK</b>
	)	<b>OF SUBJECT MATTER JURISDICTION</b>
vs.	)	
	)	
HWAL'BAY BA:J ENTERPRISES, INC., d.b.a. GRAND CANYON RESORT CORPORATION, ET AL.,	)	
	)	
Respondents.	)	

TO PLAINTIFFS:

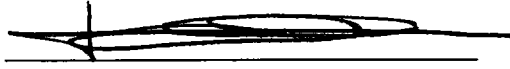
PLEASE TAKE NOTICE that Specially Appearing Respondents do hereby move the Hualapai Tribal Court for an order dismissing with prejudice Plaintiffs' action against Specially Appearing Respondents.

This motion is based on the ground that the Court does not have jurisdiction to adjudicate this matter, as Respondents enjoy sovereign immunity from unconsented suit.

This motion is based on this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities, all pleadings and documents on file and upon such evidence and arguments as may properly come before the Court at the time of the hearing.

Respectfully submitted this 23rd day of April, 2014.

KEWENVOYOUMA LAW, PLLC



Jason M. Croxton

Verrin T. Kewenvoyouma

*Attorneys for Specially Appearing Respondents*

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing SPECIALLY APPEARING RESPONDENTS' NOTICE OF MOTION AND MOTION TO DISMISS FOR LACK OF SUBJECT MATTER JURISDICTION was mailed via first-class mail on April 23, 2014 to:

Ali J. Farhang  
Farhang & Medcoff, PLLC  
4801 E. Broadway Blvd., Suite 311  
Tucson, Arizona 85711  
*Attorney for Plaintiffs*



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