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Tara Jeanne Amboh Post Office Box 155 Neola, Utah 84053

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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

TARA JEANNE AMBOH,

Case No. 2:21-CV-00564

Plaintiff,

v.

DUCHESNE COUNTY, a political subdivision of State of Utah, and DUCHESNE COUNTY ATTORNEY STEPHEN FOOTE,

Defendant,

PLAINTIFF'S MOTION FOR ORDER TO SHOW CAUSE WHY DEFENDANTS AND ITS ATTORNEY'S, SHOULD NOT BE HELD IN CIVIL CONTEMPT OF THIS COURT

Magistrate Judge Cecilia Romero

ORAL ARGUMENT NOT REQUIRED

Comes Now the Plaintiff Tara J. Amboh Uinta Band
Utah Indian, Member of the Uinta Valley Treaty Reserve of
1861-1864, respectfully submits Plaintiff's Motion For
Order To Show Cause why Defendants And Its Attorney's,
Should Not Be Held In Civil Contempt Of This Court, as
follows; And moves this Court for an Order directing the
defendant Duchesne County Attorney's, to show cause why
they should not be held in civil contempt of the Tenth
Circuit Court Appeal in, Ute Indian Tribe v. State of

<u>Utah</u>, (<u>Ute VI</u>), 780 F. 3d 1000 (10th Cir. 2015), the time has come to respect the peace and maintain Uintah Valley Reserve promises. In this event involving the 10th Circuit Court ruling provisions and the Defendants have persisted in failing to respect the ruling of <u>Ute Indian Tribe v</u>. State of <u>Utah</u>, (<u>Ute V</u>), 114 F. 3d 1513 (10th Cir. 1997), that has caused individuals like Plaintiff states costs and fees, they may expect to meet with sanctions in the Federal District Court. <u>Lonsdale v</u>. <u>United States</u>, 919 F. 2d 1440, 1448 (10th Cir. 1990), grounds for this Motion can be by the Court fully discussed in the accompanying Memorandum in Support of Motion for Order to Show Cause.

An Order directing Defendant, and Attorneys to jointly and severally pay to the Plaintiff Uinta Band Utah Indian for the sum of \$5,000.00, for each and every day following seven Calendar days from the issuance of this Court's Order of Contempt that Defendant, and Attorneys fail to comply with this Court's Order.

Respectfully submitted on 6th day of January, 2023.

Tara J. Amboh

Uinta Band Utah Indian

Member

CERTIFICATE OF SERVICE

Hereby certify that on 6^{th} , day of January, 2023, I have filed the foregoing:, which caused parties of record to be served PLAINTIFF'S MOTION FOR ORDER TO SHOW CAUSE WHY DEFENDANT AND ITS ATTORNEYS SHOULD NOT BE HELD IN CIVIL CONTEMPT OF THIS COURT on;

Kyle J. Kaiser Christian L. Biggs Assistant Utah Attorney General Sean D. Reyes Utah Attorney General 160 East 300 South, 6th Floor Post Office Box 140856 Salt Lake City, Utah 84114-0856

Michael W. Homer
Jesse C. Trentadue
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8 East Broadway, Suite 200
Salt Lake City, Utah 84111

Tyler Allred
Duchesne County Attorney's Office
Post Office Box 346
734 North Center Street
Duchesne, Utah 84021

Respectfully submitted,

Tara J. Amboh

Tara J. Amboh Post Office 155 Neola, Utah 84053 (435) 724-4461

January 6, 2023

United States District Court Office of Clerk 351 South West Temple Salt Lake City, Utah 84101

RE: Amboh v. Duchesne County, et al., No. 2: 21-cv-00564

Following have filed the foregoing; PLAINTIFF'S MOTION FOR ORDER TO SHOW CAUSE WHY DEFENDANTS AND ITS ATTORNEY'S SHOULD NOT BE HELD IN CIVIL CONTEMPT OF THIS COURT, which are hereby filed for the court.

Respectfully submitted.

Tara J. Amboh





RDC 99

U.S. District Court Office of the Clerk 351 South West Temple Salt Lake City, Utah 84101