

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

UNITED STATES OF AMERICA)	
and)	
STATE OF NEW MEXICO, <i>ex rel.</i> STATE)	
ENGINEER,)	
)	
Plaintiffs,)	
)	No. 01cv00072 BB/WDS
and)	
)	ZUNI RIVER BASIN
ZUNI INDIAN TRIBE, NAVAJO NATION,)	ADJUDICATION
)	
Plaintiffs in Intervention,)	
)	
v.)	
)	
A & R PRODUCTIONS, et al.)	
)	
Defendants.)	
)	

MOTION FOR ENTRY OF DEFAULT

The Plaintiff United States of America (“United States”) hereby requests the Clerk of the Court, pursuant to Fed. R. Civ. P. 55(a), to enter the default of the following named defendants for failure to answer or otherwise plead; and the undersigned certifies that no Subfile Answer, appearance, or other pleading required by the Procedural and Scheduling Orders entered in this case has been served upon the Plaintiffs’ attorneys and filed with the Court with respect to the indicated subfiles:

Defendant	Subfile
Maureen Kearns & Robert Kammerer Trust	ZRB-1-0049
David Zimmerman	ZRB-1-0065
Sirintorn Zimmerman	ZRB-1-0065

Byron South	ZRB-1-0096
Irene P. South	ZRB-1-0096
David Bradford	ZRB-1-0131
Evelyn Bradford	ZRB-1-0131
Jose Montoya	ZRB-1-0181
Unknown Heirs of Eugenio Landavazo	ZRB-2-0060
Howard Price	ZRB-3-0075
Tommy D. Hartsfield	ZRB-3-0075
Donald J. Philippe	ZRB-3-0075
Darla Nicoll	ZRB-3-0092
Roy Eddie Merrill	ZRB-3-0111
Thomas Mooney	ZRB-3-0115
Beverly J. Munoz	ZRB-3-0117
Luis Munoz	ZRB-3-0117
Stuart Sanders	ZRB-3-0145
Leyton J. Cougar	ZRB-3-0188
Russell Roper	ZRB-3-0190
Shirley Roper	ZRB-3-0190
R.W. Ader	ZRB-4-0024
Anna M. Berube Trust	ZRB-4-0042
Steven Berube, Trustee	ZRB-4-0042
Luis Baeza	ZRB-4-0113
Lisa Baeza	ZRB-4-0113
Avran Garcia Revocable Trust UTA Dated April 28, 1997	ZRB-4-0160
Cherie L. Kalista	ZRB-4-0189
Paul L. Lopez	ZRB-4-0246
Alexandra N. Lopez	ZRB-4-0246
Anne Lowden-Gilpin	ZRB-4-0248

Rudy Garcia, Trustee of the Diana Mae Garcia Special Needs Trust	ZRB-4-0431
Henry Axtell	ZRB-4-0454
Sharon Axtell	ZRB-4-0454
Deward Lance Bond	ZRB-5-0066
Tony Eriacho, Jr.	ZRB-6-0001
Leo Eriacho	ZRB-6-0001
Sefferino Eriacho	ZRB-6-0002
Loretta Eriacho	ZRB-6-0002

Dated: August 12, 2009

Electronically Filed

/s/ Bradley S. Bridgewater

BRADLEY S. BRIDGEWATER
U.S. Department of Justice
1961 Stout Street - 8th Floor
Denver, CO 80294
(303) 844-1359

COUNSEL FOR THE UNITED STATES

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on August 12, 2009, I filed the foregoing *Motion for Entry of Default* electronically through the CM/ECF system, which caused CM/ECF participants to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

AND I FURTHER CERTIFY that on such date I served the foregoing on the following non-CM/ECF participants in the manner indicated:

Via Regular Mail:

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_____/s/_____
Bradley S. Bridgewater