

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 MV/LFG
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 plead or otherwise defend; specifically for failure to file with the Court a Subfile Answer or sign and return the last-offered Consent Order. The undersigned certifies that no Subfile Answer has been filed with the Court and served on counsel for the Plaintiffs, as required by the applicable Procedural and Scheduling Order, and that the defendants have failed to sign and return the last-offered Consent Order for the Subfile indicated within twenty (20) days of service of *Notice that the Consultation Period has Ended*.

Defendant	Subfile	Notice Filed:
KEVIN ZAJICEK	ZRB-1-0191	October 4, 2012 (No. 2806)

Defendant	Subfile	Notice Filed:
KARLENE ZAJICEK	ZRB-1-0191	October 4, 2012 (No. 2806)

Dated: January 17, 2013

Electronically Filed

/s/ Bradley S. Bridgewater

BRADLEY S. BRIDGEWATER

U.S. Department of Justice

South Terrace, Suite 370

999 18th Street

Denver, CO 80202

Phone: (303) 844-1359

COUNSEL FOR THE UNITED STATES

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on January 17, 2013, 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

KARLENE ZAJICEK
KEVIN ZAJICEK
HC 61 BOX 59
RAMAH, NM 87321

_____/s/_____
Bradley S. Bridgewater