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 INDIAN TRIBE, NAVAJO NATION, |) ZUNI RIVER BASIN) 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, 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: |
|-----------------------|------------|------------------------------|
| WILLARD LAVAR CLAWSON | ZRB-5-0021 | February 12, 2013 (No. 2846) |

| Defendant | Subfile | Notice Filed: |
|--------------------|------------|------------------------------|
| DORIS JEAN CLAWSON | ZRB-5-0021 | February 12, 2013 (No. 2846) |

The Notice that the Consultation Period has Ended for Subfile ZRB-5-0021 was also served on

these defendants a second time, at an alternate address, on March 26, 2013 (No. 2856).

Dated: April 25, 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 April 25, 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

WILLARD LAVAR CLAWSON DORIS JEAN CLAWSON 2215 E. 4TH AVE. APACHE JUNCTION, AZ 85219

WILLARD LAVAR CLAWSON DORIS JEAN CLAWSON PO BOX 116 RAMAH, NM 87321

/s/

Bradley S. Bridgewater