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

UNITED STATES OF AMERICA, and)	
STATE OF NEW MEXICO ex rel. STATE)	
ENGINEER,)	
Plaintiffs,)	
and)	No. 01CV00072-MV/WPL
ZUNI INDIAN TRIBE, NAVAJO NATION,)	ZUNI RIVER BASIN ADJUDICATION
Plaintiffs in Intervention,)	
)	
v.)	
A 0 D DDODUCTIONS 1)	
A & R PRODUCTIONS, et al.,)	
Defendants.)	
)	
	/	

MOTION FOR ENTRY OF DEFAULT

The Plaintiff United States of America 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 Federal Rules of Civil Procedure or 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 subfile(s):

John Tolman ZRB-4-0168

Earnestine Tolman ZRB-4-0168

DATED: April 22, 2016.

Respectfully submitted,

/s/ Samuel D. Gollis
Samuel D. Gollis
U.S. Department of Justice
999 18th Street
South Terrace, Suite 370
Denver, CO 80202
(303) 844-1351

Andrew "Guss" Guarino Bradley S. Bridgewater U.S. Department of Justice 999 18th Street South Terrace, Suite 370 Denver, CO 80202 (303) 844-1343

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 22, 2016, 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

John Tolman Earnestine Tolman 515 W. Greens Rd 8th Floor Houston, TX 77067

/s/ Samuel D. Gollis
Samuel D. Gollis