

**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)
))
ZUNI INDIAN TRIBE, NAVAJO NATION,)
))
Plaintiffs in Intervention,)
))
v.)
))
A & R PRODUCTIONS, et al.,)
))
Defendants.)
))
_____)

No. 01CV00072-MV/WPL

**ZUNI RIVER BASIN
ADJUDICATION**

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):

Colin E. O’Neill, Johanne F. O’Neill &
Gregory C. Frank

Subfile No. ZRB-1-0077

DATED: July 7, 2016.

Respectfully submitted,

/s/ Samuel D. Gollis
Samuel D. Gollis
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Andrew "Guss" Guarino
Bradley S. Bridgewater
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 7, 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

Johanne F. and Colin E. O'Neill
Gregory C. Frank
343 Baker Lane
Erie, CO 80516

/s/ Samuel D. Gollis
Samuel D. Gollis