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

and)	
STATE OF NEW MEXICO, ex rel. STATE)	
ENGINEER,)	
Distractor.)	
Plaintiffs,) No. 01cv00072 BB/W	/DS
and)	
) ZUNI RIVER BASIN	1
ZUNI INDIAN TRIBE, NAVAJO NATION,) ADJUDICATION	
)	
Plaintiffs in Intervention,) Subfile No. ZRB-3-00)32
)	
V.)	
)	
A & R PRODUCTIONS, et al.)	
)	
Defendants.)	
)	

MOTION TO WITHDRAW MOTION FOR DEFAULT JUDGMENT

The Plaintiffs United States of America ("United States") and New Mexico ex rel. State Engineer ("State") hereby move to withdraw the Motion for Default Judgment filed March 20, 2008 (Document No. 1660), concerning Defendant Cibola County and Subfile No. ZRB-3-0032.

Communications with non-record counsel for the Defendant have resulted in a determination that there may be an error in the water rights description contained in the motion.

WHEREFORE Plaintiffs respectfully move the Court to order Document 1660 withdrawn.

DATED: March 28, 2008

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

(approved via telephone 3/27/2008)

ARIANNE SINGER Office of the State Engineer, Legal Division P.O. Box 25102 Santa Fe, NM 87504 (505) 827-6150

COUNSEL FOR THE STATE OF NEW MEXICO EX REL. STATE ENGINEER

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on March 28, 2008, I filed the foregoing Motion To Withdraw Motion For Default Judgment 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:

I further certify that on March 28, 2008, a copy of the foregoing was served by first class mail on the non-CM/ECF participant party and non-record counsel set forth below.

Flynn Ryan Modrall Sperling P.O. Box 2168 Albuquerque, NM 87103-2168

Cibola County 515 W. High Street Grants, NM 87020

Bradley S. Bridgewater