

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 BB/WDS |
| and |) | |
| |) | ZUNI RIVER BASIN |
| ZUNI INDIAN TRIBE, NAVAJO NATION, |) | ADJUDICATION |
| |) | |
| Plaintiffs in Intervention, |) | Subfile No. ZRB-1-0100 |
| |) | |
| v. |) | |
| |) | |
| A & R PRODUCTIONS, et al. |) | |
| |) | |
| Defendants. |) | |
| _____ |) | |

MOTION FOR ENTRY OF DEFAULT

In compliance with paragraph III.C.3 of the Special Master’s September 8, 2005 *Amended Procedural and Scheduling Order for the Adjudication of Water Rights Claims in Sub-Areas 4 and 8 of the Zuni River Stream System* (Doc. No. 387) (“September 8, 2005 Procedural Order”), 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 defendant for failure to “sign and return a *Consent Order* or file a form *Answer* by January 10, 2006;” and the undersigned certifies that no *Consent Order* or form *Answer* required by the September 8, 2005 Procedural Order was served upon the Plaintiffs’ attorneys or filed with the Court with respect to the indicated subfile by January 10, 2006:

| Defendant | Subfile |
|------------------------|----------------|
| JOANN STRICKLAND TRUST | ZRB-1-0100 |

Dated: January 28, 2009

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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on January 28, 2009, 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 participant in the manner indicated:

Via Regular Mail:

JOANN STRICKLAND TRUST
P.O. BOX 2554
MILAN, NM 87021

_____/s/_____
Bradley S. Bridgewater