

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 RIVER BASIN
ZUNI INDIAN TRIBE, NAVAJO NATION,)	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 answer or otherwise plead; and the undersigned certifies that no Request for Consultation, Subfile Answer, appearance, or other pleading required by the Procedural and Scheduling Orders entered in this case has been served upon the Plaintiffs’ attorneys or filed with the Court with respect to the indicated subfiles:

Defendant	Subfile
JERRY CLARK	ZRB-3-0201
VIRGINIA CLARK	ZRB-3-0201

Defendant	Subfile
TIMOTHY BRYANT	ZRB-4-0474
LINDA BRYANT	ZRB-4-0474
FLORA JAMES CLAWSON	ZRB-5-0016
HAZEL CLAWSON	ZRB-5-0016

The United States also 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 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 and served on counsel for the Plaintiffs, 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:
LOUIS W. GROSS	ZRB-1-0035	January 30, 2012 (No. 2748)
WILHELMINA GROSS	ZRB-1-0035	January 30, 2012 (No. 2748)
KENNETH BRUTON	ZRB-2-0026	December 5, 2011 (No. 2734)
ERNEST CHAVEZ	ZRB-3-0029	January 30, 2012 (No. 2749)
SHARON M. ALLEN	ZRB-4-0004	September 21, 2010 (No. 2604)
BOA SORTE LIMITED PARTNERSHIP	ZRB-4-0126	September 13, 2010 (No. 2587)

Defendant	Subfile	Notice Filed:
VIEL GLUCK LIMITED PARTNERSHIP	ZRB-4-0126	September 13, 2010 (No. 2587)
BEN FATTO LIMITED PARTNERSHIP	ZRB-4-0126	September 13, 2010 (No. 2587)
MT. BALDY LIMITED PARTNERSHIP	ZRB-4-0126	September 13, 2010 (No. 2587)
JOHN V. MINNECI	ZRB-4-0270	January 30, 2012 (No. 2751)
ELIZABETH M. MINNECI	ZRB-4-0270	January 30, 2012 (No. 2751)
PAUL PETRANTO	ZRB-4-0312	January 30, 2012 (No. 2752)
THE RIVARD FAMILY TRUST	ZRB-4-0381	February 2, 2012 (No. 2760)

Dated: October 30, 2012

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 October 30, 2012, 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

JERRY CLARK
VIRGINIA CLARK
2737 LA BRUCHERIE RD
IMPERIAL, CA 92251

TIMOTHY BRYANT
LINDA BRYANT
1011 E. MADDOCK ROAD
PHOENIX, AZ 85086

FLORA JAMES CLAWSON
HAZEL CLAWSON
P.O. BOX 546
RAMAH, NM 87321

LOUIS W. GROSS
WILHELMINA GROSS
BOX 36
RAMAH, NM 87321

KENNETH BRUTON
P.O. BOX 746
FENCE LAKE, NM 87315

ERNEST CHAVEZ
900 N. 6TH ST
SOCORRO, NM 87801

SHARON M. ALLEN
P.O. BOX 894
RAMAH, NM 87321

BOA SORTE LIMITED PARTNERSHIP
VIEL GLUCK LIMITED PARTNERSHIP
BEN FATTO LIMITED PARTNERSHIP
MT. BALDY LIMITED PARTNERSHIP
C/O BRENT BOWDEN
1223 S. CLEARVIEW AVE, SUITE 105
MESA, AZ 85209

JOHN V. MINNECI
ELIZABETH M. MINNECI
4007 COBBLE CT.
PALMDALE, CA 93551

PAUL PETRANTO
HC 61, BOX 759
RAMAH, NM 87321

THE RIVARD FAMILY TRUST
5812 WEST MARCONI AVE.
GLENDALE, AZ 85306

_____/s/_____
Bradley S. Bridgewater