

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,	)	
	)	
v.	)	
	)	
A & R PRODUCTIONS, et al.	)	
	)	
Defendants.	)	
_____	)	

**APPLICATION 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 Subfile Answer, appearance, or other pleading has been served upon the Plaintiffs’ attorneys with respect to the indicated subfiles:

<b>Defendant</b>	<b>Subfile</b>
Jose Sanchez	ZRB-1-0090
Sofia Sanchez	ZRB-1-0090
Debra Lee Oliver	ZRB-2-0010
Estate of Derek Osborne Beaton	ZRB-2-0015
Beulah Bruton	ZRB-2-0025

<b>Defendant</b>	<b>Subfile</b>
William L. Bruton	ZRB-2-0028
Neusa Bruton	ZRB-2-0028
Dennis M. Norton	ZRB-2-0033
Linda Federico-Degeest	ZRB-2-0037
Leo G. Degeest	ZRB-2-0037
H.C. Johnson	ZRB-2-0054
Barbara Johnson	ZRB-2-0054
Jim McAvoy	ZRB-2-0068
Chita McAvoy	ZRB-2-0068
Eloise McDorman	ZRB-2-0069
Gary McDorman	ZRB-2-0069
Kenneth Owens	ZRB-2-0078
Geraldine Kaye Pittman	ZRB-2-0079
Eloy Sanchez	ZRB-2-0081
Angie Sanchez	ZRB-2-0081
Daniel A. White	ZRB-2-0093 & ZRB-2-0094
Evelyn White	ZRB-2-0094
Glenn McDorman	ZRB-2-0103
Virginia McDorman	ZRB-2-0103

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*.

<b>Defendant</b>	<b>Subfile</b>	<b>Notice Filed and Served</b>
Jack W. Aragon	ZRB-1-0001	October 9, 2007, Doc. No. 1297
Virginia Aragon	ZRB-1-0001	October 9, 2007, Doc. No. 1297
Charles Aragon	ZRB-1-0138	October 9, 2007, Doc. No. 1298
Virginia Aragon	ZRB-1-0138	October 9, 2007, Doc. No. 1298
Maureta Bell Wilson Revocable Trust	ZRB-2-0095	April 3, 2007, Doc. No. 1090
Angie Marez <sup>1/</sup>	ZRB-2-0102	November 5, 2007, Doc. No. 1382

Dated: December 12, 2007

Electronically Filed

/s/ Bradley S. Bridgewater

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BRADLEY S. BRIDGEWATER  
U.S. Department of Justice  
1961 Stout Street - 8<sup>th</sup> Floor  
Denver, CO 80294  
(303) 844-1359

COUNSEL FOR THE UNITED STATES

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<sup>1/</sup> Defendant Angie Marez did serve Counsel for the United States with a Subfile Answer claiming no right in Subfile ZRB-2-0102, which was received on November 19, 2007. However, pursuant to the *Amended Procedural and Scheduling Order for the Adjudication of Water Rights Claims in Sub-Areas 9 and 10 of the Zuni River Stream System* (Doc. No. 436) a Subfile Answer for Subfile ZRB-2-0102 was to be filed with the Court no later than April 10, 2006. Ms. Marez has never filed a Subfile Answer with the Court.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on December 12, 2007, I filed the foregoing *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. 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**

Jose Sanchez & Sofia Sanchez  
HC 61, Box 5024  
Ramah, NM 87321

Gary McDorman & Eloise McDorman  
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Maureta Bell Wilson Rev. Trust  
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Angie Marez  
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Jack W. Aragon & Virginia Aragon  
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Charles Aragon & Virginia Aragon  
700 Oso Ridge Rt  
Grants, NM 87020

\_\_\_\_\_/s/\_\_\_\_\_  
Bradley S. Bridgewater