

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/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

In compliance with Paragraph II.D of the Court’s August 22, 2011 *Scheduling Order to Govern Further Proceedings for Disputed Non-Indian Water Rights Claims* (No. 2695), the Plaintiffs United States of America (“United States”) and State of New Mexico ex rel State Engineer (“State”) hereby request 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 appear or otherwise defend with respect to the indicated subfiles as required by the May 3, 2011 *Order Setting Scheduling Conference* (No. 2654):

Defendant	Subfile
Deborah Green Trustee for Tribal Trust	ZRB-2-0047
James Green Trustee for Tribal Trust	ZRB-2-0047

Marilyn O. Zug	ZRB-2-0111
Richard B. Zug	ZRB-2-0111
Beverly Brooks	ZRB-3-0018
Richard Brooks	ZRB-3-0018
David Swindle Trustee	ZRB-3-0175
Linda Swindle Trustee	ZRB-3-0175
Jack L. Woods	ZRB-4-0351
B. Elaine Woods	ZRB-4-0351
Tonia Montague	ZRB-4-0406
Kenneth Montague	ZRB-4-0406

Dated: August 30, 2011

Electronically Filed

/s/ Bradley S. Bridgewater

BRADLEY S. BRIDGEWATER
ANDREW J. GUARINO
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COUNSEL FOR THE UNITED STATES

(approved 8/25/2011)
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COUNSEL FOR THE STATE OF NEW
MEXICO EX REL. STATE ENGINEER

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on August 30, 2011, 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:

DEBORAH GREEN TRUSTEE FOR
TRIBAL TRUST & JAMES GREEN
TRUSTEE FOR TRIBAL TRUST
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MONTAGUE
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_____/s/_____
Bradley S. Bridgewater