

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 defendant for failure to plead or otherwise defend; specifically 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 defendant has 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:
PRISCILLA SCHULTE	ZRB-3-0143	February 14, 2013 (No. 2849)

Dated: April 5, 2013

Electronically Filed

/s/ Bradley S. Bridgewater

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BRADLEY S. BRIDGEWATER

U.S. Department of Justice

South Terrace, Suite 370

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Denver, CO 80202

Phone: (303) 844-1359

COUNSEL FOR THE UNITED STATES

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on April 5, 2013, 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**

PRISCILLA SCHULTE  
P.O. BOX 5721  
KETCHIKAN, AK 99901

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