

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATE OF AMERICA,)	
)	
and)	
)	
STATE OF NEW MEXICO ex rel. STATE)	
ENGINEER,)	No. 01cv00072-MV/WPL
)	
Plaintiffs,)	ZUNI RIVER BASIN
)	ADJUDICATION
-v-)	
)	
A & R PRODUCTIONS, <i>et. al.</i> ,)	
)	
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 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 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:
PETER CARLSON & MARILYN CARLSON	ZRB-2-0119	August 28, 2015 (Doc. 3080)
CROSSFIRE CATTLE CO.	ZRB-4-0110	August 28, 2015 (Doc. 3079)
AUDREY MORANO	ZRB-5-0001	August 28, 2015 (Doc. 3081)
EDD COFFEY	ZRB-5-0022	September 3, 2015 (Doc. 3084)
WILLAIM G. COFFEY	ZRB-5-0023	September 3, 2015 (Doc. 3085)

Dated: November 13, 2015

Electronically Filed

/s/ Samuel D. Gollis

SAMUEL D. GOLLIS
U.S. Department of Justice
South Terrace, Suite 370
999 18th Street
Denver, CO 80202
Phone: (303) 844-1351

COUNSEL FOR THE UNITED STATES

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on November 13, 2015, 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

Peter Carlson
Marilyn Carlson
1625 Los Beros Rd
Arroyo Grande, CA 93420

Crossfire Cattle Co.
c/o Buster Green
HC 60 Box 5
Quemado, NM 87829

Audrey Morano
735 S. 9th Street
Canon City, CO 81212-4911

Edd Coffey
P.O. Box 9
Ramah, NM 87321

William Coffey
1347 N, 1350 E
Richfield, ID 83349

/s/ Samuel D. Gollis
Samuel D. Gollis