

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

UNITED STATES OF AMERICA, and)
STATE OF NEW MEXICO ex rel. STATE)
ENGINEER,)
)
Plaintiffs,)
)
and)
)
ZUNI INDIAN TRIBE, NAVAJO NATION,)
)
Plaintiffs in Intervention,)
)
v.)
)
A & R PRODUCTIONS, et al.,)
)
Defendants.)
)
)
_____)

No. 01CV00072-MV/WPL

ZUNI RIVER BASIN
ADJUDICATION

MOTION FOR ENTRY OF DEFAULT

The Plaintiff United States of America 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 required by the Federal Rules of Civil Procedure or the Procedural and Scheduling Orders entered in this case has been served upon the Plaintiffs' attorneys and filed with the Court with respect to the indicated subfile(s):

The Unknown Heirs of Doris Chick ZRB-3-0031

DATED: May 17, 2016.

Respectfully submitted,

/s/ Samuel D. Gollis
Samuel D. Gollis
U.S. Department of Justice
999 18th Street
South Terrace, Suite 370
Denver, CO 80202
(303) 844-1351

Andrew "Guss" Guarino
Bradley S. Bridgewater
U.S. Department of Justice
999 18th Street
South Terrace, Suite 370
Denver, CO 80202
(303) 844-1343

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 17, 2016, 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

Ree Ann Cole
Ray Chick
3220 Reina Dr. NE
Albuquerque, NM 87111-5038

Olivia Carney
P.O. Box 761
Fence Lake, NM 87315-0761

Barbara O'Bryon
296 NorthWood Terrace
Williamstown, WV 26187

Wayne Childers
P.O. Box 121
Helen, NM 87002

L. B. Tarry
611 Laguna
Belen, NM 87002

Roberta Hay
P.O. Box 163
Adrian, OR 97901-0163

Frank Tarry
6 Yucca Drive
Belen, NM 87002

Cynthia Lewis
P.O. Box 711
Ramah, NM 87321-0711

Winona Walton
1523 12th Avenue
Safford, AZ 85546

/s/ Samuel D. Gollis
Samuel D. Gollis