

**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)	No. 01CV00072-MV/WPL
)	
ZUNI INDIAN TRIBE, NAVAJO NATION,)	ZUNI RIVER BASIN
)	ADJUDICATION
Plaintiffs in Intervention,)	
)	Subfile No. ZRB-3-0031
v.)	
)	
A & R PRODUCTIONS, et al.,)	
)	
Defendants.)	
)	
_____)	

**DECLARATION OF KARMEN MILLER IN SUPPORT OF PLAINTIFFS’
MOTION FOR DEFAULT JUDGMENT**

I, Karmen Miller, am employed as a Paralegal Specialist with the Department of Justice and have been assigned to work in support of counsel for the United States in the above-captioned case.

A. Pursuant to the *Order Granting Joint Motion to Amend Procedural and Scheduling Orders and Establish or Revise Deadlines for Defendants to Return Requests for Consultation and Submit Subfile Answers in Sub-areas, 4, 8, 9, 10, & 7* (Doc. No. 837), defendants in the Zuni River Basin Adjudication were provided a service packet that included a

proposed Consent Order, Request for Consultation form, Notice of Water Rights Adjudication, a copy of the Amended 2003 Complaint, a Request for Waiver of Service of Summons, and two copies of a Waiver of Service of Summons with a prepaid return envelope. The packet also included a letter from the United States explaining the purpose of the forms and to whom and when documents were to be mailed or provided if the defendants chose to respond. The documents were mailed to the Defendants' mailing address via certified mail, return receipt requested.

B. The Unknown Heirs of Doris Chick were made parties defendant by the *Order Granting Motion to Join Additional Parties Defendant* on October 2, 2008 (Doc. No. 1899).

C. The Unknown Heirs of Doris Chick were served by publication on May 27, 2009 (Doc. No. 2379).

D. A revised Consent Order was mailed to the Defendants' last known address on June 16, 2015. We received no response from the Defendants.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: June 8, 2016

/s/ Karmen Miller
KARMEN MILLER
U.S. Department of Justice
999 18th Street, Suite 370
South Terrace
Denver, CO 80202
(303) 844-1355