

4. Good cause exists to set aside the entry of default with respect to the defendant named above.

WHEREFORE, the Plaintiff State of New Mexico *ex rel.* State Engineer requests the Court to set aside the entry of default for the above-named defendant.

DATED: June 14, 2007

Respectfully submitted,

/s/ Ed Newville
EDWARD G. NEWVILLE
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 14th day of June, 2007 I filed the foregoing electronically through the CM/ECF system and served the following non-CM/ECF Participant in the manner indicated:

via first class mail, postage prepaid addressed as follows:

Jose Salomon Lucero
4209 El Conlan Avenue
Las Vegas, NV 89102

/s/ Ed Newville
Edward G. Newville