

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

STATE OF NEW MEXICO
State Engineer, *ex rel.*

Plaintiff,

v.

R. LEE AAMODT,
et al.,
Defendants.

and

**UNITED STATES OF AMERICA,
PUEBLO DE NAMBE,
PUEBLO DE POJOAQUE,
PUEBLO DE SAN ILDEFONSO,
and PUEBLO DE TESUQUE,
Plaintiffs-in-Intervention**

NO. 66Cv6639 WJ/WPL

MOTION FOR DEFAULT JUDGMENT

COMES NOW Plaintiff State of New Mexico ex rel. Office of the State Engineer, and moves the Court to enter its order granting default judgment against the following defendants:

ROBERT W. HIGGINSON AAM - RG-36330

1. Defendant(s) named above are in default for failure to appear, answer, or otherwise defend in this cause, as shown by the Clerk's Certificate of Default filed November 21, 2016 (Docket No. 11087).

WHEREFORE, the plaintiff State of New Mexico requests the Court to enter its order granting default judgment against the above-named defendants incorporating the terms of the State's proposed consent order in Subfile(s) AAM - RG-36330.

Respectfully Submitted,

/s/ Edward C. Bagley

EDWARD C. BAGLEY

Special Assistant Attorney General

New Mexico Office of the State Engineer

P.O. Box 25102

Santa Fe, New Mexico 87504-5102

(505) 827-7844

edward.bagley@state.nm.us

CERTIFICATE OF SERVICE

I hereby certify that on 27th of Nov 2016, I filed the foregoing electronically through the CM/ECF system which caused the parties on the electronic service list, as more fully set forth in the Notice of Electronic Filing, to be served via electronic mail, and served the following non-CM/ECF participants in the manner indicated:

Via first class mail, postage prepaid addressed as follows:

ROBERT W. HIGGINSON

247-F ROSARIO BLVD. SANTA FE, NM 87501

/s/ Edward C. Bagley

EDWARD C. BAGLEY