

**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:

JOHN J. LENDRUM III                      AAM - RG-37105

GUYLENE E. LENDRUM                      AAM - RG-37105

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-37105.

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 27<sup>th</sup> 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:

GUYLENE E. LENDRUM	10819 ROARING BROOK LANE HOUSTON, TX 77024
JOHN J. LENDRUM III	10819 ROARING BROOK LANE HOUSTON, TX 77024

/s/ Edward C. Bagley  
EDWARD C. BAGLEY