



U.S. Department of Justice

Environment and Natural Resources Division

LL:SLM

90-6-2-63C

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May 8, 2001

via Federal Express

Diana R. Delaney, Chief Deputy Clerk
Snake River Basin Adjudication
DISTRICT COURT
253 Third Ave., North
Twin Falls, Idaho 83303-2707

Re: SRBA Case No. 39576
Subcases listed on Exhibit A

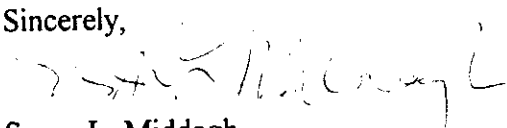
Dear Ms. Delaney:

Enclosed for filing are the following original documents in the above mentioned subcases:

1. **UNITED STATES' MOTION FOR PROTECTIVE ORDER AND FOR EXPEDITED CONSIDERATION**

Thank you for your time and attention in this matter.

Sincerely,


Susan L. Middagh
Paralegal

Enclosure

Name of Party Filing Document:
UNITED STATES OF AMERICA

Attorneys' Names and Addresses:
THOMAS L. SANSONETTI
Assistant Attorney General
Environment and Natural Resources Division

R. LEE LEININGER
LARRY A. BROWN
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380 Parkcenter Blvd.
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**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT
OF THE STATE OF IDAHO IN AND FOR THE COUNTY OF TWIN FALLS**

In Re SRBA	)	Subcase Nos.: See Attached Exhibit A
	)	
	)	UNITED STATES' MOTION FOR
	)	PROTECTIVE ORDER AND FOR
	)	EXPEDITED CONSIDERATION
Case No. 39576	)	
_____	)	

MOTION

Pursuant to Idaho R. Civ. P. 26(c)(1), the United States hereby moves the Court for an order that the discovery proffered by the State of Idaho on April 25, 2002 entitled *State of Idaho's First Set of Interrogatories, Requests for Admission, and Requests for Production to the United States*, attached as Exhibit B, not be had. A protective order is necessary because the

United States believes these interrogatories, requests for admission and requests for production of documents relate to a claim that is *res judicata* and therefore is not germane to the subject matter involved in the pending action.

ARGUMENT

The State of Idaho is seeking discovery from the United States regarding the Bureau of Land Management's ("BLM") Public Water Reserve 107 ("PWR 107") claims in the above captioned subcases. The State's discovery purportedly goes to an issue the Idaho Supreme Court and the SRBA Court have already decided, i.e., whether the BLM has failed to comply with the Federal Land Policy and Management Act of 1976, Pub. L. 94-579, 90 Stat. 2743 (FLPMA).¹ This argument was raised by the State in briefing on Basin-Wide Issue No. 9 six years ago. See *State of Idaho's Response Brief Opposing The Validity of Public Water Reserve No. 107 As a Basis For a Federal Reserved Water Right*, dated April 26, 1996, at 15-18. It was also raised, albeit very belatedly, by the State last year in the final briefing in the United States' challenge to the Special Masters' decisions regarding the State's objections. See *State of Idaho's Response Brief to Supplemental Memorandum of United States*, subcases 23-10872, *et al.*, dated September 5, 2001, at 10.

¹ The State's discovery actually goes well beyond a request for documents and information related to FLPMA or FLPMA procedures. For example, its discovery asks, *inter alia*, that the United States "identify any photographs, videos, motion pictures, computer generated graphics, maps, drawings, diagrams, measurements, surveys, or other graphic descriptions that were created or developed in support of BLM's PWR water right claims filed in the SRBA," and that the United States "identify any technical reports or other written information in support of these PWR claims." *Id.* at Interrogatory Nos. 12 and 13. The United States reserves the right to seek protection from these and other overly-broad and burdensome requests should the discovery not be denied *in toto*.

The State lost Basin-Wide Issue No. 9 on appeal. *United States v. State*, 131 Idaho 468, 959 P.2d 449 (1998). Furthermore, the State lost on the United States' challenge. On December 28, 2001, Judge Burdick issued a *Memorandum Decision and Order on Challenge (Scope of PWR 107 Reserved Rights); Order of Recommitment to Special Master Cushman* (consolidated subcase numbers 23-10872, *et al.*). This decision rejected the State of Idaho's objections to the United States' PWR 107 based stockwatering claims stating "this decision constitutes a final disposition of the objections raised in this matter and the significant number of subcases dependent on this ruling." *Id.* at 36. The subcases were remanded back to the Special Master for a *prima facie* showing pursuant to I.C. § 42-1411A(12). *Id.* at 35. Despite the Court's disposition of the objections, on remand the State declared that its objections were not resolved. The State's claim of unresolved objections is not in accord with the plain language of the Court's decision.

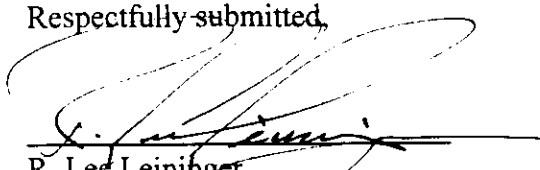
Due to the State's continued efforts to prosecute PWR 107 objections, the United States on May 8, 2002 filed with the Fifth Judicial District Court, a *Motion for Clarification and Stay, and for Expedited Consideration Thereof*. The United States is seeking clarification of the December 28, 2001 order with regard to the scope of issues on remand and the procedures necessary to demonstrate a *prima facie* case complying with Idaho Code § 42-1411(a)(12). Until such clarification is made, the State of Idaho's request for discovery should not be had.

CONCLUSION

For the reasons set forth above, the United States respectfully requests that the Court grant a protective order barring the State's discovery pending resolution of the United States' *Motion for Clarification and Stay, and for Expedited Consideration Thereof*.

Dated this 8th day of May, 2002.

Respectfully submitted,


R. Lee Leininger
Attorney, Department of Justice

CERTIFICATE OF MAILING

I certify that on May 8, 2002, I mailed a true and correct copy of the **UNITED STATES' MOTION FOR PROTECTIVE ORDER AND FOR EXPEDITED CONSIDERATION** to the following persons, postage prepaid and addressed as follows:

Document Depository
Idaho Department of Water Resources
PO Box 83720
Boise, ID 83720-0098

US Department of Justice
Environment & Natl' Resources Division
550 West Fort Street, MSC 033
Boise, ID 83724

David Barber, Esq.
Natural Resources Division
Office of Attorney General
State of Idaho
P.O. Box 4449
Boise, Idaho 83711-4449

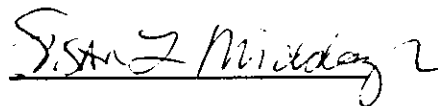


EXHIBIT A

EXHIBIT A

21-12003	21-12079	25-13684
21-12005	21-12081	25-13686
21-12007	21-12083	25-13688
21-12009	21-12085	25-13942
21-12011	21-12087	31-10981
21-12013	21-12089	31-10983
21-12015	21-12091	31-11000
21-12017	21-12093	31-11022
21-12019	21-12095	31-11026
21-12021	21-12099	31-11028
21-12023	21-12105	31-11030
21-12027	21-12107	31-11088
21-12029	21-12109	31-11090
21-12031	21-12113	31-11110
21-12033	21-12115	31-11112
21-12035	21-12117	31-11114
21-12037	21-12119	31-11116
21-12039	21-12121	31-11118
21-12041	21-12123	31-11120
21-12045	21-12125	31-11122
21-12047	21-12127	31-11126
21-12049	21-12129	31-11128
21-12051	21-12131	31-11130
21-12053	21-12133	31-11144
21-12055	21-12135	31-11158
21-12057	25-13639	31-11160
21-12059	25-13641	31-11162
21-12061	25-13643	31-11172
21-12063	25-13645	31-11180
21-12065	25-13647	31-11184
21-12067	25-13649	31-11287
21-12069	25-13651	31-11288
21-12071	25-13655	51-12038
21-12073	25-13657	51-12157
21-12075	25-13674	51-12158
21-12077	25-13682	51-12418

US Motion for Protective Order
and for Expedited Consideration

EXHIBIT A

EXHIBIT B

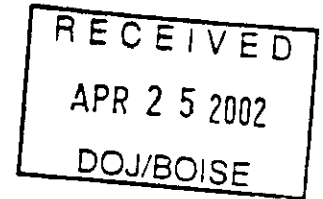
Movant: State of Idaho



ALAN G. LANCE
ATTORNEY GENERAL

CLIVE J. STRONG
Deputy Attorney General
Chief, Natural Resources Division

DAVID J. BARBER (ISB #2597)
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dbarber@ag.state.id.us



IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT
OF THE STATE OF IDAHO IN AND FOR THE COUNTY OF TWIN FALLS

In Re SRBA	)	SUBCASE Nos.: (See Attached Exhibits A and B)
	)	
Case No. 39576	)	STATE OF IDAHO'S FIRST SET OF INTERROGATORIES,
	)	REQUESTS FOR ADMISSION, AND REQUESTS
	)	FOR PRODUCTION TO THE UNITED STATES
_____	)	

INTRODUCTION

This document contains the interrogatories, requests for admission, and requests for production being submitted to the United States regarding subcases described in the attached Exhibits A and B. These interrogatories, requests for admission, and requests for production are made pursuant to and are governed by the orders of the SRBA District Court and Rules 26, 33, and 34 of the Idaho Rules of Civil Procedure.

US Motion for Protective Order
and for Expedited Consideration

EXHIBIT B

GENERAL INSTRUCTIONS

1. Unless otherwise indicated, these interrogatories, requests for admissions and requests for production refer to all claims for stock water purposes made by the United States under the federal reserved water rights doctrine based on Public Water Reserve 107 in Basins 21, 25, 31, and 51.

2. These interrogatories, requests for admissions, and requests for production are deemed continuing in nature, and your responses are to be supplemented as additional information and, knowledge becomes available or, known to you, as provided in Rule 26(e) of the Idaho Rules of Civil Procedure.

3. In answering these interrogatories, requests for admissions, and requests for production, furnish all information which is known or available to you, including, but not limited to, information known of your personal knowledge, information obtainable by the diligent search of sources of information available to you, and all information in the possession of, or available to, any person or persons acting on your behalf, or under your control, or under the control of any of your attorneys, agents, employees, experts, insurers, independent contractors, investigators, representatives, or others with whom you have a relationship and from whom you are capable of deriving information, documents or material.

4. Any reference herein to an individual, partnership, corporation, or other entity, shall include the present and past agents, employees, representatives, and assigns of that individual or entity.

5. If you withhold any information, in whole or in part, which is called for in an interrogatory, request for admission, or request for production on the ground that it is subject to attorney-client privilege, or other privilege, please do all of the following: (1) identify the

information or document; (2) state the basis for each claim of privilege or other objection; and (3) identify each person or entity having knowledge of the basis for each claim of privilege or other objection.

6. If, for reasons other than alleged privilege, you do not provide a complete response to any interrogatory, request for admission, or request for production, please state with respect to such interrogatory, request for admission, or request for production that a complete response is not provided and state the reason for the incomplete response.

7. Please serve the original written responses to these interrogatories, requests for admission, and requests for production with a copy of the notice of serving on the State of Idaho.

INSTRUCTIONS FOR INTERROGATORIES

1. You must respond to the interrogatories within fifteen (15) days of service by fully setting forth each interrogatory followed by an answer or objection to each interrogatory under oath.

INSTRUCTIONS FOR REQUESTS FOR ADMISSION

1. You will be deemed to have admitted the truth of the matters set forth in these requests for admissions unless, within fifteen (15) days of service of the request, you serve an answer or objection addressed to the matters set forth, signed under oath by you or your attorney.

2. If an objection is made to a requested admission, the reasons therefor shall be stated. The answer shall specifically deny the matter or set forth in detail the reasons why you cannot truthfully admit or deny the matter. A denial shall fairly meet the substance of the requested admission, and when good faith requires that you qualify your answer or deny only a part of the matter of which an admission is requested, you shall so specify so much of it as is true and qualify or deny the remainder. You may not give lack of information or knowledge as a

reason for failure to admit or deny unless you state that you have made a reasonable inquiry and that the information known or readily obtainable by is insufficient to enable you to admit or deny. You may not object to a request only on the ground that the matter of which an admission has been requested presents a genuine issue for trial.

INSTRUCTIONS FOR REQUESTS FOR PRODUCTION

1. Please produce the documents and things for inspection and copying on the 10th day of May, 2002, at 9:00 a.m. at the State of Idaho, Office of the Attorney General, 700 W. Jefferson Street, Rm. 210, Boise, Idaho 83720-0010, or such other time and place as may be mutually agreed by the parties. Inspection and copying will be conducted by the undersigned attorneys or their agents and will continue from time to time and from day to day until completed.

2. If you will make the originals of the requested documents available at a subsequent time requested by the State of Idaho, upon reasonable notice, then the requests for production of documents may be satisfied by mailing true, correct, and legible copies of each and every requested document to David J. Barber, Deputy Attorney General, Office of the Attorney General, 700 W. Jefferson Street, Rm. 210, P.O. Box 83720, Boise, Idaho 83720-0010 within the prescribed time.

3. Each document requested to be produced shall be provided in a manner which preserves its sequential relationship with other documents being produced and shall include the file folder and folder tabs associated with its file location. If the file location is not apparent on the folder and tabs, the document shall be accompanied by information indicating from where the file was taken and such additional information as is necessary to enable the State of Idaho to determine the document's original pre-production location.

4. You are requested to provide a response within fifteen (15) days of service of this request stating whether you will produce the requested documents at the specified place and time and reasons for any objection. If you refuse to produce any document, you must identify it as provided in these instructions and state the legal grounds for non-production.

Definitions:

In answering these interrogatories, all terms used retain their normal meaning. The following terms, in addition to their commonly understood definitions, shall have the following meanings:

- A. The acronym "BLM" refers to the Bureau of Land Management, an agency within the U. S. Department of the Interior, and includes all agency personnel and attorneys and other representatives of the agency.
- B. The term "custodian" means the person who has possession or control of documents and a request for the identity of a custodian constitutes a request for his name, last known address, and telephone number.
- C. The term "data," as used in this document, refers to measurements, estimates, and observations made for the purposes of establishing and quantifying the stock water claims of the United States made under PWR 107 and under state law for beneficial use. The term "data" includes all files prepared in conjunction with these studies. For purposes of illustration, and not of limitation, the following list is an example of documents that should be produced in response to requests for production related to quantification of the stock water claims of the United States made under PWR 107 and under state law for beneficial use. Data for other types of consumptive claims may vary from the examples given below:

- field data books and all raw data
- photographs of the study sites
- daily logs of field activities and chain of custody documentation for all data.

D. The term “document” shall be defined in the broadest possible manner and shall, at a minimum, mean any original or copy of words or information, whether produced in original or copy form by printing, typing, recording, retrieval from electronic storage, manual reproduction, or other process and regardless of the form. The term “document” includes, but is not limited to, writings, agreements, communication, correspondence, electronic mail messages, reports, telegrams, memoranda, summaries or records of telephone conversations, summaries or records of personal conversations or interviews, diaries, records, maps, charts, plans, drawings, sketches, photographs, graphs, notes, summaries or records of meetings or conferences, summaries or reports of investigations or negotiations, opinions, or reports of consultants, drafts of any document, phonorecords, printouts from electronic storage or other data compilations from which information can be obtained or translated, if necessary, by the respondent through detection devices into reasonably usable form, marginal comments appearing on any document and all other writing.

E. The acronym “FLPMA” refers to the Federal Land Policy Management Act of 1976, Pub. L. 94-579, 90 Stat. 2743.

F. The term “identify” means:

- (1) as to documents, give the date of each such document, the addressor’s name, position, and address, the addressee’s name, position and address, any file, index or other identification number, title and general character of the document, and

specify the name, address and position of the person or persons having custody and control thereof. Alternatively, the document may be appended to your answer.

- (2) as to a person, or entity, give the full name, business address and telephone number; last known home address and telephone number; the person's current employment, position and duties, the person's relationship to the United States; the person's educational background, and if the person is an employee of the United States, the date of the employee's original employment by the United States.
- (3) as to conversations, including telephone communications, or meetings, give:
 - a. the date, place and time such communication occurred;
 - b. the identity of each and every person between whom the communication was transmitted, who was present or who participated in the conversation, and any other person(s) who have knowledge of such communication;
 - c. the place at which such communication occurred, or in the case of telephone conversations, the location of each party; and
 - d. a detailed statement of the substance of what was discussed or what actions were taken.
- (4) as to administrative or judicial proceedings:
 - a. the caption of the proceeding;
 - b. the administrative or judicial tribunal, including the business address and phone number; and
 - c. the date(s) a witness provided testimony.

- (5) as to independent contractors:
- a. the duties assigned to and performed by the contractor;
 - b. the date of the contractor's original employment;
 - c. the date the contractor completed the duties assigned to and performed by the contractor; and
 - d. the nature of the final work product submitted by that contractor to the United States and the title or other identification of that final work product.
- (6) as to any person who the United States claims is an expert witness within the meaning of I.R.C.P. 26:
- a. the name, address and telephone number of that expert witness;
 - b. the occupation or profession of the expert;
 - c. any title of the expert witness;
 - d. the educational background of the expert witness;
 - e. the subject matter on which the expert is expected to testify;
 - f. the substance of the facts and opinions to which the expert is expected to testify; and
 - g. a summary of the grounds for each opinion.
- G. A request for the "**location**" of documents constitutes a request to state the present address at which such documents are kept, if known, and if not known, the last address known and information as to their disposition.
- H. The definition of "**person**" in Idaho Code § 42-1401A(8) (Supp. 1995) is incorporated herein by reference.

- I. The acronym "PWR" refers to public water reserve.
- J. The term "relied" or "rely" when used in a request for all documents relied upon in the preparation of claims, refers not only to documents containing information supporting the stock water claims made by the United States, but also all documents reviewed, obtained, or prepared by the United States or its employees, agents or contractors in the course of preparing the claims, whether or not the information in those documents ultimately supports the claims submitted by the United States.
- K. The acronym "SRBA" refers to the Snake River Basin Adjudication.
- L. References to the "United States" includes its departments, agencies, employees, agents, or representatives, and as used in these discovery requests encompasses all information related to the water right claims of the BLM filed in the SRBA.

INTERROGATORIES, REQUESTS FOR ADMISSION, AND REQUESTS FOR PRODUCTION

Discovery Requests Relating to Claims Made

by the United States Bureau of Land Management Under PWR 107

Request for Admission No. 1.

Admit that the documents contained in Exhibit C and described herein are true and correct copies of documents on file with the BLM. The documents are described as follows:

Interpretation No. 38 February 9, 1927	Interpretation No. 51 January 17, 1928	Interpretation No. 83 February 16, 1929
Interpretation No. 106 August 29, 1929	Interpretation No. 120 February 10, 1930	Interpretation No. 123 March 13, 1930
Interpretation No. 125 March 15, 1930	Interpretation No. 131 June 5, 1930	Interpretation No. 142 January 17, 1931
Interpretation No. 145 April 15, 1931	Interpretation No. 156 February 3, 1932	Interpretation No. 160 April 8, 1932

Interpretation No. 169 August 4, 1932	Interpretation No. 171 September 27, 1932	Interpretation No. 175 January 23, 1933
Interpretation No. 177 February 15, 1933	Interpretation No. 186 June 6, 1933	Interpretation No. 189 October 17, 1933
Interpretation No. 205 August 30, 1934	Interpretation No. 209 September 27, 1934	Interpretation No. 214 March 28, 1935
Interpretation No. 220 September 11, 1935	Interpretation No. 221 November 7, 1935	Interpretation No. 228 February 26, 1937
Interpretation No. 251 March 8, 1939	Interpretation No. 261 April 10, 1940	Interpretation No. 264 April 10, 1940
General Land Office Order March 20 1942	General Land Office Order March 24, 1942	BLM Memorandum May 26, 1955
BLM Memorandum July 8, 1959	BLM Memorandum April 6, 1960	BLM Memorandum August 1, 1967
BLM Memorandum January 9, 1968	BLM Memorandum January 26, 1968	BLM Memorandum September 23, 1968
BLM Memorandum October 15, 1970	BLM Memorandum September 11, 1974	

Request for Production No. 1.

If you deny Request for Admission No. 1, produce a true and correct copy of each Order of Interpretation, General Land Office Order, or BLM Memorandum that you identified as not being a true and correct copy.

Request for Production No. 2.

Produce a "Case Management Audit Report" from the database maintained by the Bureau of Land Management of the land status of Public Water Reserves in Idaho using the following selection criteria:

ADMINISTRATIVE STATE = ID

PRINT REMARKS

CASE TYPE = 231104

ACTION CODES = 124 387 501 801

Request for Production No. 3.

Produce a list of all case types entered into the database maintained by the Bureau of Land Management of the land status of lands in Idaho.

Request for Production No. 4.

Produce a list of all action codes entered into the database maintained by the Bureau of Land Management of the land status of lands in Idaho.

Interrogatory No. 1.

Identify those water right claims of the United States in Basin 21, 25, 31, and 51 that are based on any Order of Interpretation of Public Water Reserve 107 listed in Request for Admission No. 1.

Interrogatory No. 2.

Identify all persons who had any responsibility in investigating, preparing or submitting the notice of claims of the United States based on Public Water Reserve 107.

Interrogatory No. 3.

In addition to those persons listed in response to Interrogatory No. 3, identify all other persons employed or previously employed by the BLM who have knowledge or any relevant fact concerning the BLM's PWR claims filed in the SRBA.

Interrogatory No. 4.

Identify all persons who are or were independent contractors hired by the United States to assist in any way in the investigation, preparation, and submission of the BLM's PWR claims in the SRBA.

Interrogatory No. 5.

Identify all persons who you propose to call as expert witnesses to substantiate BLM's PWR claims in the SRBA.

Interrogatory No. 6.

Please indicate for each expert identified in response to Interrogatory No. 5 if that expert has given you a written opinion.

Interrogatory No. 7.

For each expert identified in response to Interrogatory No. 5 state:

- a. the expert's name;
- b. the date of the opinion;
- c. the subject matter of the opinion; and
- d. whether the United States intends to call the expert as a witness during trial of this matter.

Interrogatory No. 8.

Did the BLM or someone working on behalf of the BLM make a field inspection of each PWR water right claimed listed in Exhibits A and B?

Interrogatory No. 9.

For each field inspection, state the following:

- a. the nature or type of inspection, and the date of each;

- b. identify the person who conducted or assisted in the inspection;
- c. state whether field notes were made during the inspection;
- d. describe the written report made of each inspection;
- e. state whether any summary reports cumulating the information gathered in the field inspection reports written;
- f. identify the persons who have possession or custody of each report described in subdivisions (d) & (e).

Interrogatory No. 10.

Did the BLM rely on any agency standards, procedures or other methodology in conducting the field investigations described in response to Interrogatory No. 9?

Interrogatory No. 11.

If the answer to Interrogatory No. 10 is in the affirmative, state:

- a. its identity, including its title, publication, volume, issue, date, page, etc.;
- b. the name and address of its publisher, or other information explaining where a copy may be found; and
- c. a description of the nature and extent of BLM's reliance on this agency standard, procedure, or other methodology.

Interrogatory No. 12.

Identify any photographs, videos, motion pictures, computer generated graphics, maps, drawings, diagrams, measurements, surveys, or other graphic descriptions that were created or developed in support of BLM's PWR water right claims filed in the SRBA.

Interrogatory No. 13.

Identify any technical reports or other written information in support of these PWR claims.

Interrogatory No. 14.

Identify all other persons who you propose to call as witnesses to substantiate BLM's PWR claims in the SRBA other than those identified in response to Interrogatory No. 5.

Request for Admission No. 2.

Admit that the BLM created a serialized case file for its public water reserves.

Interrogatory No. 15.

Describe the purpose for creation of the serialized case file for BLM's public water reserves.

Interrogatory No. 16.

Identify the serialized case file numbers for BLM's public water reserves within the Snake River Basin.

Request for Production No. 5.

Produce the serialized case files for all public water reserves within the Snake River Basin.

Interrogatory No. 17.

Identify all documents not contained in BLM's serialized case files for its public water reserves within the Snake River Basin that contain information or which pertain in any way to those public water reserves.

Interrogatory No. 18.

Identify all persons having knowledge of any of the documents listed in Interrogatory No. 17.

Interrogatory No. 19.

Identify all persons who assisted in the preparation of the reports entitled "Withdrawal Review Report" or "Land Report" as required by Section 204(1) of FLPMA for public water reserves within the Snake River Basin.

Request for Production No. 6.

Produce all exhibits the United States proposes to use in your direct and/or rebuttal cases.

Request for Admission No. 3.

Admit that Exhibit D is a true and correct copy of page 167 from the book entitled "OPPORTUNITY AND CHALLENGE The Story of BLM" by James Muhn and Hanson R. Stuart.

Request for Admission No. 4.

Admit that page 167 attached as Exhibit D accurately describes the events stated therein.

Request for Production No. 7.

Produce a true and correct copy of the July 8th critique described in Exhibit D.

Request for Production No. 8.

Produce a true and correct copy of the 250-page detailed analysis described in Exhibit D.

Interrogatory No. 20.

Identify the custodian of the BLM's land status records in Idaho.

Interrogatory No. 21.

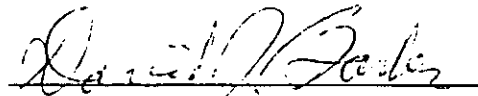
Identify all documents not previously identified in the answers to any interrogatory hereinabove, which relate to or pertain to any facts given in answer to the foregoing interrogatories.

Interrogatory No. 22.

Identify all persons who assisted in the preparation of the United States' Responses to these Interrogatories, Requests for Admissions, and Requests for Production.

DATED this 25th day of April, 2002.

ALAN G. LANCE
Attorney General

A handwritten signature in dark ink, appearing to read "David J. Barber", is written over a horizontal line.

David J. Barber
Deputy Attorney General
Natural Resources Division

P2114NBA