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Department of Water Resources

Jason D. Walker, Esq.
LING & ROBINSON
Attorneys at Law
P. O. Box 396
Rupert, Idaho 83350-0396
Telephone: (208) 436-4717
Facsimile: (208) 436-6804
ISB No. 5790

Attorneys for Minidoka County
School District #331

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

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In re: SRBA	Subcase Nos: 36-07134, 36-07135 (School District No. 331)
	FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS AND REQUEST FOR ADMISSIONS

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COMES NOW, Jason D. Walker of the firm Ling & Robinson, attorney of record for the Minidoka County School District in the above-entitled action, pursuant to the Idaho Rules of Civil Procedure, and hereby submits the following Interrogatories and Requests for Production of Documents to Director, Idaho Department of Water Resources and requests that the same be answered under oath, and within fifteen (15) days of the date of receipt thereof as provided in said Rules.

INTERROGATORY NO. 1: Please state the name, address and telephone number of each and every person known to you or

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your attorney who has any knowledge of, or purports to have any knowledge of the facts of this case.

INTERROGATORY NO. 2: Please state the name, addresses and telephone numbers of all persons you intend to call as a witness at the trial of this matter. With respect to the witnesses which you intend or expect to call at the trial of this action, please also provide the following information:

a. The current occupation of the witness; and

b. A summary of the substance of each witness' testimony.

INTERROGATORY NO. 3: You are hereby requested to provide a list of all exhibits which you intend or expect to utilize at the trial of this cause, giving a description of each exhibit and a summary of the exhibit's relevance to the case.

REQUEST FOR PRODUCTION NO. 1: Please produce copies of all documents you intend to use as exhibits at the trial of this matter.

INTERROGATORY NO. 4: Describe each and every document or other writing in your possession, including any written notes, memoranda or written statements of any kind, whether in your possession or your attorney's, which in any way pertain to the facts and circumstances at issue in this particular action.

REQUEST FOR PRODUCTION NO. 2: Please produce copies

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of any document or other writing in your possession, including written notes, memoranda or statements which pertain to the facts and circumstances in this matter.

INTERROGATORY NO. 5: Have you consulted with any expert witnesses concerning the events referred to in this litigation?

INTERROGATORY NO. 6: If your answer to the preceding Interrogatory is in the affirmative, please state:

a. The identity of each person whom you expect to call as an expert witness;

b. The subject matter in which the expert will testify;

c. The opinions to which the expert will testify;

d. A summary of the grounds for each opinion that the expert will give; and

e. The identity of each person whom you have consulted with as an expert, but will not call as a witness.

REQUEST FOR PRODUCTION NO. 3: Please produce the curriculum vitae for any such expert witness which you have consulted in regard to this matter.

Claimant reserve the right to ask additional Interrogatories and Requests for Production of Documents and/or take oral depositions; further, the foregoing Interrogatories and Requests for Productions of Documents shall be considered continuing and at such times as additional information becomes available to the responding party, responding party's attorney,

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agents, servants, employees, representatives or assigns, supplemental answers and responses should be filed with respect to the appropriate Interrogatories and Requests for Production of Documents hereinabove set forth.

REQUEST FOR ADMISSION

REQUEST FOR ADMISSION 1: Please admit that the water being pumped by the Claimant, Minidoka County School District, for Claim No. 36-07134 is recapture of project water of Minidoka Irrigation District.

INTERROGATORY NO. 7: If your response to the above Request for Admission is negative, please set forth the specificity of the facts upon which you rely in denying said Request for Admission.

REQUEST FOR ADMISSION 2: Please admit that the water being pumped by the Claimant, Minidoka County School District, for Claim No. 36-07135 is recapture of project water of Minidoka Irrigation District.

INTERROGATORY NO. 8: If your response to Request for Admission No. 1 is negative, please explain in detail the source of the water being pumped by Claimant including the hydrology creating the high water table.

DATED this 21 day of January, 2003.

LING & ROBINSON

By: /s/ JASON D. WALKER
Jason D. Walker
Attorney for Minidoka
County School District

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ATTORNEYS AT LAW
RUPERT, IDAHO 83350-0396

CERTIFICATE OF MAILING

I hereby certify that on the 21 day of January, 2003, I served a copy of the foregoing **FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS AND REQUEST FOR ADMISSIONS** upon:

Nicholas B. Spencer
Idaho State Attorney General's Office
P. O. Box 83720
Boise, ID 83720-0098

Karl J. Dreher, Director
Idaho Department of Water Resources
1301 North Orchard Street
Boise, ID 83706

by depositing a copy thereof in the United States mail, postage prepaid, in an envelope addressed to said attorney at the foregoing address.

/s/ JASON D. WALKER

Jason D. Walker

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ATTORNEYS AT LAW
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