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JAN 27 2006
DEPARTMENT OF
WATER RESOURCES

Brett and Nancy Casperson
8893 E. Maughan Road
Lava Hot Springs, Idaho 83246
208-776-5428

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 No. 29-13406
	)	
	)	CLAIMANTS' FIRST INTERROGATORIES
RE: Case No. 39576	)	AND REQUEST FOR PRODUCTION OF
		DOCUMENTS TO RESPONDENTS

COME NOW WE Brett and Nancy Casperson hereby (collectively "Claimants"), submit the following Interrogatories and Requests for Production of Documents to Candice McHugh, Legal Counsel; IDWR ("Respondents"). You are directed to Answer and Respond to the following Interrogatories and Request for Production of Documents within fifteen (15) days of service upon you. Further, these Interrogatories are deemed to be continuing and should you at any time acquire additional information you are to supplement these Interrogatories.

INTERROGATORIES

INTERROGATORY NO. 1: Please set forth the name, address and phone number of each person who is providing the information to answer each respective interrogatory.

INTERROGATORY NO. 2: State the name, address and telephone number of each and every person and/or entity who disagrees with the priority date, point of diversion, place of use and nature of use of Water Right No. 29-13406 Prior to 1932 and from 1932 to date.

INTERROGATORY NO. 3: Please state the name and address of each person you intend to call as a witness at the trial of this matter and the substance of each person's expected testimony.

INTERROGATORY NO. 4: Identify by name and address each and every person you intend to call as an expert at the trial of this matter and for each such person the following:

- a. The scientific, technical or other specialized knowledge possessed by such person.
- b. The knowledge, skill, experience, training and education which qualifies such person as an expert.
- c. All facts and data upon which the expert bases his opinion.
- d. All opinions and inferences to which the expert may testify and the reasons therefore.

INTERROGATORY NO. 5: Please describe in full and complete detail and provide a copy of any and all photographs, drawings, illustrations, memorandum, letters, contracts, warranty deeds, title reports, abstracts or other documents which you or witnesses are aware of which pertain to your opposition to the priority date claimed and the historic diversion and use of water under Water Right No. 29-13406.

INTERROGATORY NO. 6: With respect to your opposition to the 1932 priority date under Water Right No. 29-13406, please list the individuals of which you have corresponded in reference to the clerical error on the date of 1932 and explain precisely and in detail the nature of any conversations.

INTERROGATORY NO. 7: Please explain in detail why the recommendation of 1962 date was used instead of the 1932.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1: Please produce all documents which pertain to and/or which you base your answer to the above interrogatories.

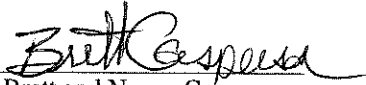
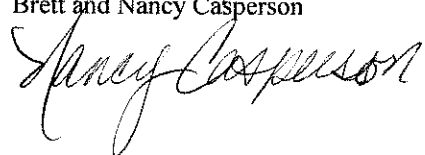
REQUEST FOR PRODUCTION NO. 2: Produce a copy of all documents that which have been exchanged with respondents or other entities in relation to opposition to correcting the priority date of 1932 vs. 1962.

REQUEST FOR PRODUCTION NO. 3: Produce a copy of all documents which you intend to present as exhibits at the time of trial.

REQUEST FOR PRODUCTION NO. 4: Produce copies of all documents which evidence your opposition to the claimed priority date of 1932 and the diversion and application to beneficial use for irrigation purposes of water under Water Right No. 29-13406 for each year prior to 1932 and from 1932 to date.

REQUEST FOR PRODUCTION NO. 5: Please produce all documents that were used in making the recommendation of the 1962 priority date.

DATED this 24th day of January, 2006.

By 
Brett and Nancy Casperson


CERTIFICATE OF SERVICE

I **HEREBY** CERTIFY that on this 24th day of January 2006, I mailed a true and Complete copy of the foregoing documents, postage prepaid, to each of the following:

Original to:

Candice McHugh

Director of IDWR

P.O. Box 83720

Boise., Idaho 83720-0098