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DEPARTMENT OF
WATER RESOURCES

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Attorneys for N. Stanley Standal


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)	A. Subcase 37-793
)	
Case No. 39576)	MOTION FOR REASSIGNMENT
_____)	AND VACATION OF HEARING

COMES NOW, David Heida, of ARKOOSH LAW OFFICES, attorney for N. Standley Standal and hereby moves this honorable court for a reassignment of the case from Special Master Bilyeu to another Special master given attorney J. Dee May, employs Ms. Bilyeau's husband, Jeff Duggan, in another enterprise. This motion is to remove any sense of impropriety or any notion of a conflict of interest and is supported by Exhibit "A", attached hereto and incorporated herewith. Furthermore, N. Stanley Standal moves this honorable court vacate the hearing scheduled on the 23rd day of August at 9:30 a.m. based upon the above recited.

DATED this 18 day of August, 2006.

ARKOOSH LAW OFFICES, CHTD



David Heida

CERTIFICATE OF MAILING

I certify that on August 18, 2006, I mailed the original and copies of this objection, including all attachments, to the following persons:

1. Original to:

Clerk of the District Court
Snake River Basin Adjudication
253 Third Avenue North
PO Box 2707
Twin Falls, ID 83303-2707

2. One copy to the claimant of the water right at the following address:

Black Canyon Farms, Inc.
C/O Jerry Jaramillo
317 River Rd.
Bliss, ID 83314

Black Canyon Bliss, LLC
P.O. Box 95
Rupert, ID 83350

3. Copies to:

IDWR Document Depository
PO Box 83720
Boise, ID 83720-0098

J. Dee May
P.O. Box 1846
Twin Falls, ID 83303

United States Department of Justice
Environment & Nat'l Resources Div
550 W Fort Street, MSC 033
Boise, ID 83724

Chief, Natural Resources Division
Office of Attorney General
PO Box 44449
Boise, ID 83711-4449



David Heida

AUG 17 2006

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P.O. Box 6091
83707
Telephone (208) 429-0905
Facsimile (208) 342-7278

August 15, 2006

Mr. N. Stanley Standal
609 River Road
Bliss, ID 83314

RE: SRBA Case No. 39576

Dear Mr. Standal:

I received a few days ago a notice setting the above entitled case for an initial hearing in front of Special Master Brigitte Bilyeu on August 23rd at 9:30 a.m. I didn't know whether it would make a difference but I needed you to be aware that besides being an attorney I also own and am the broker of a real estate brokerage under the name of Red Door Realty, LLC. In that capacity I have a real estate agent working for my brokerage by the name of Jeff Duggan; Mr. Duggan is married to Ms. Bilyeu. I am sending a copy of this letter to Ms. Bilyeu because I didn't know how this matter would be addressed, if at all. I just wanted you to be aware so that you could make a determination on your own as to whether or not that relationship with Mr. Duggan caused you any concern. I do not believe it raises an issue which needs to be addressed, but I felt that you needed to, at least, know so that you could act accordingly. ✓ LW

Thank you very much.

Very truly yours,

MAY, SUDWEEKS & BROWNING, LLP

J. DEE MAY

JDM:mab

cc: Justin May
Rod Jentzsch
Brigitte Bilyeu

