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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 "Attachment A")
	)	
Case No. 39576	)	SCHEDULING PROPOSAL
	)	
_____	)	

Pursuant to the direction of the Special Master, several parties in the above-referenced sub-cases met at the Idaho Department of Water Resources on November 4, 2008. At the meeting, the parties discussed the trial schedules for the various subcases and arrived at a tentative schedule based on discussion of the nature and substance of the issues in each subcase, the logistics of extensive discovery and document production, and in the interest of overall efficiency for the court and the parties in managing these sub-cases to conclusion. Following the meeting, a proposed schedule was circulated, but not all parties were in agreement with that schedule.

Despite the parties lack of agreement on a schedule, the schedule tentatively agreed to by the parties represents a useful starting point for discussion at the November 20, 2008 scheduling conference. Accordingly, the United States submits the schedule below. This schedule differs from the proposed schedule circulated among the parties only in that it expressly provides for a sequenced approach to pursuing summary judgment in the various proceedings.

Trial Schedule for Minidoka Power Rights: 1-217, 1-218, 1-4024 and 1-4025*

- | | |
|---|--|
| 1. Trial Date | Wednesday December 9 through Friday December 11, 2009 starting at 10:00 am |
| 2. Reply to Expert Report | November 4, 2009 |
| 3. Expert Report Deadline | October 21, 2009 |
| 4. Status Conference Regarding Special Master's Order on Summary Judgment and Expert Disclosure and Deposition Scheduling | September 25, 2009 at 9:30 am |
| 5. Hearing on Summary Judgment | August 13, 2009 at 10:00 am |
| 6. Close of Written Discovery | August 13, 2009 |
| 7. Deadline for Reply Briefs | July 23, 2009 |
| 8. Deadline for Response Briefs | July 2, 2009 |
| 9. Deadline for Motions for Summary Judgment and Briefs on Summary Judgment | June 4, 2009 |
| 10. Deadline for First Round Responses to Discovery | February 27, 2009 |

* Trial includes both the historical practices subordination issue and BOR's objection to reference to the Eagle Decree. This does not include Minidoka credit issue.

Trial Schedule for Palisades Power Rights: 1-4054 and 1-2068*

- | | |
|----------------|---|
| 11. Trial Date | Wednesday May 12 through Friday May 14, 2010 starting at 10:00 am |
|----------------|---|

- | | |
|--|--|
| 12. Deadline for Filing Motions and Briefs for Summary Judgment | January 27, 2010 |
| 13. First Date for Filing Motions and Brief for Summary Judgment | Following Order on any Motions for Summary Judgment in Minidoka, and if no Motions filed in that sub-case, August 14, 2009 |
| 14. Status/Scheduling Conference | September 25, 2009 at 10: 00 am |
| 15. Deadline for First Round Responses to Discovery | April 24, 2009 |

* Trial includes historical practices subordination issue and all other issues except Pioneer ownership issue.

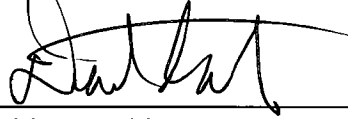
Trial Schedule for American Falls Rights: 1-2017, 1-2032, 1-2046, 1-2064, 1-4052, 1-10042, 1-10382, 1-10383, 1-10384, 1-10485, 1-10486, 1-10487, 1-10531, 1-10532 and 1-2064 *

- | | |
|--|--|
| 16. Trial Date | Monday October 8 through Friday October 12, 2010 starting at 10:00 am |
| 17. Deadline for Filing Motions and Briefs for Summary Judgment | July 13, 2010 |
| 18. First Date for Filing Motions and Brief for Summary Judgment | Following Order on any Motions for Summary Judgment in Palisades, and if no Motions filed in that sub-case, January 28, 2010 |
| 19. Status/Scheduling Conference | September 25, 2009 at 10:30 |
| 20. First Round Responses to Discovery | April 24, 2009 |

* Trial includes historical practice subordination issue and all other issues except Pioneer ownership issue. Idaho Power's alternate grounds for ownership will be tried here.

DATED this 19th day of November, 2008.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'David W. Gehlert', written over a horizontal line.

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Attorney for the United States of America

CERTIFICATE OF SERVICE

I certify that on this 17th day of November 2008, I served a true and correct copy of the foregoing SCHEDULING PROPOSAL as indicated below:

via facsimile:

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Special Master Terrence A. Dolan
SRBA Courthouse
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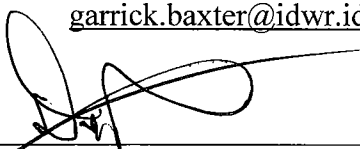
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Attachment A

Subcase Nos.

01-00217
01-00218
01-02017
01-02032
01-02046
01-02064
01-02068
01-04052
01-04054
01-10042
01-10382
01-10383
01-10384
01-10485
01-10486
01-10487
01-10531
01-10532
01-04024
01-04025