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Attorneys for Claimants Pioneer Irrigation
District, Jerry L. Tlucek, Mary Lou Tlucek,
Shelly Tlucek, Byron Tlucek, Rebekah Tlucek,
Kevin Tlucek and DBSI Tiegs 979, LLC

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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

Case No. 39576

Subcase Nos.	63-02529	63-03163
	63-03274	63-03323
	63-03324	63-09109
	63-10435	

**NOTICE OF RULE 30(b)(6) DEPOSITION
DUCES TECUM OF THE STATE OF IDAHO**

PLEASE TAKE NOTICE that Claimants Pioneer Irrigation District, Jerry L. Tlucek, Mary Lou Tlucek, Shelly Tlucek, Byron Tlucek, Rebekah Tlucek, Kevin Tlucek and DBSI Tiegs 979, LLC, hereby notice the Rule 30(b)(6) deposition duces tecum of the Respondent State of Idaho ("State"), before an officer authorized to administer oaths on Tuesday, January 27, 2009 at 9:30 a.m., and continuing thereafter from day to day until

**NOTICE OF RULE 30(b)(6) DEPOSITION
DUCES TECUM OF THE STATE OF IDAHO - 1**

Client:1063493.2

completed, at the offices of MOFFATT, THOMAS, BARRETT, ROCK & FIELDS, CHARTERED, located at 101 S. Capital Blvd., 10th Floor, Boise, Idaho, at which time and place you are notified to appear and take such part in the examination as you may deem proper.

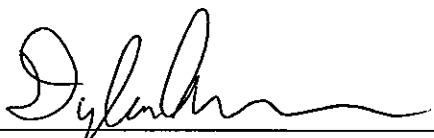
Pursuant to Idaho Rule of Civil Procedure 30(b)(6), the State must designate one or more knowledgeable representatives to testify on its behalf at this deposition. Specifically, examination is requested on the State's interest in the above-referenced subcases, and the basis for the State's position that annual diversion volume ("ADV") limitations should be included on those water rights.

Pursuant to Rule 30(b)(5), deponent is requested to bring to the deposition any and all documents, records, or correspondence, in the care, custody, possession, or control of the deponent in any way related to the above-referenced subcases, the State's interest therein, and the basis for the State's position that such water rights should include ADV limitations.

This deposition shall take place pursuant to the Idaho Rules of Civil Procedure.

DATED this 17th day of December, 2008.

MOFFATT, THOMAS, BARRETT, ROCK &
FIELDS, CHARTERED

By 
Dylan B. Lawrence – Of the Firm
Attorneys for Claimants Pioneer
Irrigation District, Jerry L. Tlucek,
MaryLou Tlucek, Shelly Tlucek, Byron
Tlucek, Rebekah Tlucek, Kevin Tlucek
and DBSI Tiegs 979, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of December, 2008, I caused a true and correct copy of the foregoing **NOTICE OF RULE 30(b)(6) DEPOSITION DUCES TECUM OF THE STATE OF IDAHO** to be served by the method indicated below, and addressed to the following:

Representing: State of Idaho
David J. Barber
Office of the Attorney General
STATE OF IDAHO
700 West State Street, 2nd Floor
P.O. Box 83720
Boise, ID 83720-0010
Fax: (208) 854-8072

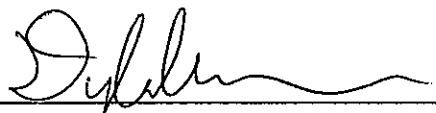
☒ U.S. Mail, Postage Prepaid
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☐ Overnight Mail
☐ Facsimile

Director
IDAHO DEPARTMENT OF WATER RESOURCES
P.O. Box 83720
Boise, ID 83720-0098
Fax: (208) 287-6700

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☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile

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☐ Overnight Mail
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Dylan B. Lawrence