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Department of Water Resources
Adjudication Bureau

Attorneys for Claimant DBSI Tiegs 979, LLC

Scott L. Campbell, ISB No. 2251
Dylan B. Lawrence, ISB No. 7136
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23255.0001

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. 63-03163 and 63-03274

**AFFIDAVIT OF DYLAN B. LAWRENCE IN
SUPPORT OF MOTION FOR PROTECTIVE
ORDER**

STATE OF IDAHO)
) ss.
County of Ada)

Dylan B. Lawrence, having been duly sworn upon oath, deposes and states as follows:

1. I am an attorney duly licensed to practice law in the State of Idaho. I represent DBSI Tiegs 979, LLC ("Claimant") in the above-referenced matter. I have access to

the client's files in this matter and make this affidavit based upon personal knowledge, and in support of the Claimant's Motion for Protective Order.

2. Attached hereto as Exhibit A is a true and correct copy of the Notice of Commencement of Chapter 11 Bankruptcy, indicating that DBSI, Inc. and several related entities filed a bankruptcy petition in U.S. Bankruptcy Court for the District of Delaware on November 6 and 10, 2008.

3. Attached hereto as Exhibit B is a true and correct copy of the Claimant's Articles of Organization that I obtained from the Idaho Secretary of State ("ISOS") website, indicating that Claimant is a member-managed limited liability company.

4. Attached hereto as Exhibit C is a true and correct copy of the electronic version of Claimant's most recent annual report filed with ISOS that I obtained from the ISOS website. It identifies DBSI Housing Inc. as Claimant's member-manager.

5. Attached hereto as Exhibit D is a true and correct copy of the Second Amended and Restate Articles of Incorporation of DBSI Inc., which I obtained from the ISOS website. Section 1 of that document changes the name of DBSI Housing Inc. to DBSI Inc.

6. Attached hereto as Exhibit E is a true and correct copy of e-mail correspondence that I sent to counsel for the State of Idaho on November 17, 2008, requesting confirmation of an agreement to extend Claimant's deadline for responding to the State's discovery requests.

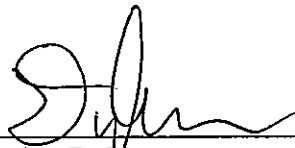
7. Attached hereto as Exhibit F is a true and correct copy of e-mail correspondence I received from counsel for the State of Idaho on November 20, 2008, confirming the agreement to extend Claimant's deadline for responding to the State's discovery requests.

8. Attached hereto as Exhibit G is a true and correct copy of correspondence dated December 15, 2008 that I received from counsel for the State of Idaho, which indicates the State's intent to file a motion to compel discovery responses and to seek sanctions.

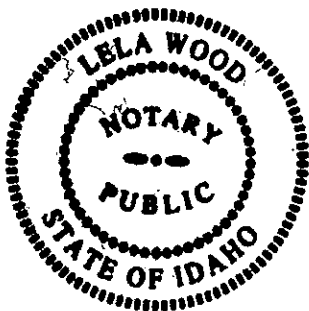
9. Attached hereto as Exhibit H is a true and correct copy of correspondence dated December 16, 2008, which I sent to counsel for the State of Idaho in response to his letter of December 15, 2008.

10. Attached hereto as Exhibit I is a true and correct copy of correspondence dated December 17, 2008 that I received from counsel for the State of Idaho, which indicates his intent to "honor" the previously agreed-to discovery response deadline of December 24, 2008.

Further your affiant sayeth naught.


Dylan B. Lawrence

SUBSCRIBED AND SWORN to before me this 19th day of December, 2008.




NOTARY PUBLIC FOR IDAHO
Residing at Boise
My Commission Expires 5-31-2012

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of December, 2008, I caused a true and correct copy of the foregoing **AFFIDAVIT OF DYLAN B. LAWRENCE IN SUPPORT OF MOTION FOR PROTECTIVE ORDER** 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
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile

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

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



Dylan B. Lawrence

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

DBSI, INC., *et al.*,

Debtors.

Chapter 11

Case No. 08-12687 (PJW)

Jointly Administered

**NOTICE OF COMMENCEMENT OF CHAPTER 11 BANKRUPTCY
CASES, MEETING OF CREDITORS AND FIXING OF CERTAIN DATES**

On November 6 and 10, 2008, DBSI, Inc., *et al.*, the debtors and debtors-in-possession in the above-captioned jointly administered cases (collectively, the "Debtors"), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the "Bankruptcy Code"). The Debtors and their respective addresses, case numbers and federal tax identification numbers are as follows:

DEBTORS	ADDRESS	OTHER NAMES (Other names used by the Debtors in the last 8 years)	CASE NO.	EIN
One-Executive Tower LLC ¹	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12666	82-0355037*
DBSI Inc.	1550 S. Tech Lane Meridian, ID 83642		08-12687	82-0355037
DBSI South 75 Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12688	20-2704298
DBSI 14001 Weston Parkway LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12689	20-2256264
DBSI CP Ironwood LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12690	82-0355037*
DBSI Lake Ellenor LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12691	82-0355037*
DBSI 12 South Place LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12692	82-0355037*
DBSI 13000 Weston Parkway LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12693	20-2256231
DBSI 2001A Funding Corporation	1550 S. Tech Lane Meridian, ID 83642		08-12694	82-0355037*

¹ One-Executive Tower LLC filed a voluntary petition for relief on November 6, 2008; all other Debtors listed herein filed voluntary petitions on November 10, 2008.

* The EIN listed on the voluntary petition for certain Debtors is the EIN for the entity that is responsible for that Debtor's taxable income. As certain Debtors are disregarded entities for tax purposes, those Debtors do not maintain their own EIN.

DEBTORS	ADDRESS	OTHER NAMES (Other names used by the Debtors in the last 8 years)	CASE NO.	EIN
DBSI 2001B Funding Corporation	1550 S. Tech Lane Meridian, ID 83642		08-12695	82-0355037*
DBSI 2001C Funding Corporation	1550 S. Tech Lane Meridian, ID 83642		08-12696	82-0355037*
DBSI 2005 Secured Notes Corporation	1550 S. Tech Lane Meridian, ID 83642		08-12697	20-3223353
DBSI 2006 Secured Notes Corporation	1550 S. Tech Lane Meridian, ID 83642		08-12698	20-5544489
DBSI 2008 Notes Corporation	1550 S. Tech Lane Meridian, ID 83642		08-12699	26-1649963
DBSI 2nd Street Quad LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12700	82-0355037*
DBSI 700 Locust LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12701	82-0355037*
DBSI Abbotts Bridge LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12702	82-0355037*
DBSI Allison Pointe LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12703	82-0355037*
DBSI Amarillo Apartments LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12704	20-2019186
DBSI Anna Plaza LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12705	82-0355037*
DBSI Arlington Town Square LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12706	82-0355037*
DBSI Arrowhead LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12707	82-0355037*
DBSI Avenues North Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12708	82-0355037*
DBSI Bandera Trails LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12709	82-0355037*
DBSI Battlefield Station LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12710	82-0355037*
DBSI Belton Town Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12711	82-0355037*
DBSI Breckinridge LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12712	82-0355037*

DEBTORS	ADDRESS	OTHER NAMES (Other names used by the Debtors in the last 8 years)	CASE NO.	EIN
DBSI Brendan Way LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12713	82-0355037*
DBSI Brookfield Pelham LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12714	82-0355037*
DBSI Cambridge Place LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12715	82-0355037*
DBSI Carolina Commons LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12716	82-0355037*
DBSI Cedar East and Cypress LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12717	20-2187873
DBSI Clear Creek Square LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12718	20-2377296
DBSI Corporate Woods LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12719	20-2033818
DBSI CP Clearwater LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12720	82-0355037*
DBSI Cranberry LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12721	82-0355037*
DBSI Cross Pointe LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12722	82-0355037*
DBSI Crosstown Woods LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12723	20-2505092
DBSI Daniel Burnham LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12724	20-2070664
DBSI Decatur LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12725	20-2070700
DBSI Eagles Landing LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12726	20-2741896
DBSI Embassy Tower LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12727	82-0355037*
DBSI Executive Dr LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12728	82-0355037*
DBSI Executive Park LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12729	20-2261886

DEBTORS	ADDRESS	OTHER NAMES (Other names used by the Debtors in the last 8 years)		
		CASE NO.		EIN
DBSI Fairlane Green LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12730	82-0355037*
DBSI Fairway LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12731	82-0355037*
DBSI Florissant Market Place LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12732	82-0355037*
DBSI Gadd Crossing LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12733	82-0355037*
DBSI Ghent Road LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12734	82-0355037*
DBSI Grant Street Portfolio LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12735	82-0355037*
DBSI Green Street Commons LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12736	82-0355037*
DBSI Guaranteed Capital Corporation	1550 S. Tech Lane Meridian, ID 83642		08-12737	82-0355037*
DBSI Hampton LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12738	82-0355037*
DBSI Hickory Plaza LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12739	82-0355037*
DBSI Highlands & Southcreek LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12740	82-0355037*
DBSI Houston Levee Galleria LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12741	82-0355037*
DBSI Kemper Pointe LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12742	82-0355037*
DBSI Kenwood Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12743	20-2505066
DBSI Keystone Commerce LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12744	82-0355037*
DBSI Lake Natoma LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12745	82-0355037*
DBSI Lamar LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12746	82-0355037*

DEBTORS	ADDRESS	OTHER NAMES (Other names used by the Debtors in the last 8 years)	CASE NO.	EIN
DBSI Landmark Towers Leaseco LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12747	82-0355037*
DBSI Lifestyle Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12748	82-0355037*
DBSI Lincoln Park 10 LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12749	82-0355037*
DBSI Mansell Forest LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12750	82-0355037*
DBSI Mansell Place LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12751	82-0355037*
DBSI Master Leaseco, Inc.	1550 S. Tech Lane Meridian, ID 83642		08-12752	20-2070548
DBSI Meadow Chase Apartments LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12753	82-0355037*
DBSI Megan Crossings LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12754	82-0355037*
DBSI Metropolitan Square LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12755	82-0355037*
DBSI Missouri LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12756	20-2256200
DBSI Network LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12757	20-2070356
DBSI North Logan Retail Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12758	82-0355037*
DBSI North Park LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12759	20-1979200
DBSI North Stafford LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12760	82-0355037*
DBSI Northlite Commons II LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12761	82-0355037*
DBSI Northpark Ridgeland LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12762	82-0355037*
DBSI Northridge LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12763	20-2185392

DEBTORS	ADDRESS	OTHER NAMES (Other names used by the Debtors in the last 8 years)	CASE NO.	EIN
DBSI Oakwood Plaza LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12764	82-0355037*
DBSI Old National Town Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12765	82-0355037*
DBSI One Executive Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12766	82-0355037*
DBSI One Hanover LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12767	20-1444404
DBSI Park Creek-Gainesville LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12768	82-0355037*
DBSI Parkway III LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12769	82-0355037*
DBSI Peachtree Corners Pavilion LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12770	82-0355037*
DBSI Phoenix Peak LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12771	82-0355037*
DBSI Pinehurst Square East LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12772	82-0355037*
DBSI Pinehurst Square West LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12773	82-0355037*
DBSI Plano Tech Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12774	20-2376346
DBSI Portofino Tech Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12775	82-0355037*
DBSI Properties Inc.	1550 S. Tech Lane Meridian, ID 83642		08-12776	20-3349713
DBSI Real Estate Funding Corporation	1550 S. Tech Lane Meridian, ID 83642		08-12777	82-0355037*
DBSI Realty Inc.	1550 S. Tech Lane Meridian, ID 83642		08-12778	82-0372831
DBSI Road 68 Retail Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12779	82-0355037*
DBSI Sam Houston Tech Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12780	82-0355037*
DBSI Sapphire Pointe LeaseCo LLC	12426 W. Explorer Drive, Suite 220		08-12781	82-0355037*

DEBTORS	ADDRESS	OTHER NAMES (Other names used by the Debtors in the last 8 years)		
		CASE NO.		EIN
	Boise, ID 83713			
DBSI Securities Corporation	1550 S. Tech Lane Meridian, ID 83642		08-12782	82-0350370
DBSI Sherwood Plaza LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12783	82-0355037*
DBSI Shoppes at Misty Meadows LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12784	82-0355037*
DBSI Shoppes at Trammel LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12785	82-0355037*
DBSI Signature Place LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12786	82-0355037*
DBSI Silver Lakes Leaseco LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12787	82-0355037*
DBSI Southport Pavilion LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12788	82-0355037*
DBSI Spalding Triangle LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12789	82-0355037*
DBSI Spring Valley Road LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12790	20-2610702
DBSI Springville Corner Leaseco LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12791	82-0355037*
DBSI ST Tower LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12792	82-0355037*
DBSI St. Andrews Place LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12793	82-0355037*
DBSI Stone Glen Village LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12794	82-0355037*
DBSI Stony Brook South LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12795	82-0355037*
DBSI Streetside at Towne Lake LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12796	82-0355037*
DBSI Topsham Fair Mall LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12797	82-0355037*

DEBTORS	ADDRESS	OTHER NAMES (Other names used by the Debtors in the last 8 years)		
		CASE NO.		EIN
DBSI Torrey Chase LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12798	82-0355037*
DBSI Treasure Valley Business Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12799	82-0355037*
DBSI Trinity Ridge Business Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12800	82-0355037*
DBSI University Park LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12801	82-0355037*
DBSI Vantage Drive LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12802	20-1255705
DBSI Watkins LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12803	20-2070283
DBSI West Oaks Square LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12804	82-0355037*
DBSI Wilson Estates LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12805	82-0355037*
DBSI Winchester Office LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12806	82-0355037*
DBSI Windcom Court LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12807	82-0355037*
DBSI Wisdom Pointe LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12808	82-0355037*
DBSI Woodlands Medical Office I LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12809	82-0355037*
DBSI Woodside Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12810	82-0355037*
DCJ Inc.	1550 S. Tech Lane Meridian, ID 83642		08-12811	82-0351881
DBSI Draper LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12812	82-0355037*
FOR 1031 LLC	1550 S. Tech Lane Meridian, ID 83642		08-12813	20-0184991
Spectrus Real Estate Inc.	1550 S. Tech Lane Meridian, ID 83642		08-12814	82-0355037*
DBSI Academy Park Loop LeaseCo LLC	12426 W. Explorer Drive, Suite 220		08-12815	82-0355037*

DEBTORS	ADDRESS	OTHER NAMES (Other names used by the Debtors in the last 8 years)	CASE NO.	EIN
	Boise, ID 83713			
DBSI Copperfield Timbercreek LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12816	82-0355037*
DBSI Corporate Center II LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12817	82-0355037*
DBSI Executive Plaza LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12818	82-0355037*
DBSI Northgate LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12819	82-0355037*
DBSI Two Notch Rd. LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12820	20-2741869
DBSI Asset Management LLC	1550 S. Tech Lane Meridian, ID 83642		08-12821	82-0355037*
DBSI 2006 Land Opportunity Fund LLC	1550 S. Tech Lane Meridian, ID 83642		08-12822	20-5347758*
DBSI Shoppes at Trammel LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12823	82-0355037*
DBSI 2007 Land Improvement & Development Fund LLC	1550 S. Tech Lane Meridian, ID 83642		08-12824	20-5432982
DBSI 2008 Land Option Fund LLC	1550 S. Tech Lane Meridian, ID 83642		08-12825	20-5390673
DBSI Alma/121 Office Commons LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12826	20-5347758*
DBSI Cottonwood Plaza Development LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12827	20-5347758*
DBSI Draper Technology 21 LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12828	20-4679604*
DBSI Escala LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12829	82-0355037*
DBSI Short-Term Development Fund LLC	1550 S. Tech Lane Meridian, ID 83642		08-12830	82-0355037
DBSI Telecom Office LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12831	73-1676718
DBSI Discovery Real Estate Services LLC	1550 S. Tech Lane Meridian, ID 83642	DDRS and DBSI	08-12834	20-2411648

DATE, TIME AND LOCATION OF MEETING OF CREDITORS: FRIDAY, DECEMBER 19, 2008 AT 10:00 A.M. (ET), 2ND FLOOR, ROOM 2112, J. CALEB BOGGS FEDERAL BUILDING, 844 NORTH KING STREET, WILMINGTON, DELAWARE.

DEADLINE TO FILE A PROOF OF CLAIM. Notice of this deadline will be sent by and through a separate notice.

NAME, ADDRESS AND TELEPHONE NUMBER OF TRUSTEE. None appointed to date.

COUNSEL FOR THE DEBTORS:

James L. Patton, Jr., Esq.
Michael R. Nestor, Esq.
Joseph M. Barry, Esq.
Kenneth J. Enos, Esq.
Young Conaway Stargatt & Taylor, LLP
1000 West Street, 17th Floor
P.O. Box 391
Wilmington, DE 19899
Telephone: (302) 576-3572

COMMENCEMENT OF CASES. A petition for reorganization under chapter 11 of the Bankruptcy Code has been filed in this Court by each of the Debtors listed above, and orders for relief have been entered. You will not receive notice of all documents filed in these cases. All documents filed with the Court, including lists of the Debtors' property and debts, are available for inspection at the Office of the Clerk of the Bankruptcy Court. In addition, such documents may be available at www.deb.uscourts.gov or www.kccellc.net/dbsi.

PURPOSE OF CHAPTER 11 FILING. Chapter 11 of the Bankruptcy Code enables a debtor to reorganize pursuant to a plan. A plan is not effective unless approved by the Court at a confirmation hearing. Creditors will be given notice concerning any plan, or in the event these cases are dismissed or converted to another chapter of the Bankruptcy Code. The Debtors will remain in possession of their property and will continue to operate any business unless a trustee is appointed.

CREDITORS MAY NOT TAKE CERTAIN ACTIONS. A creditor is anyone to whom a debtor owes money or property. Under the Bankruptcy Code, a debtor is granted certain protection against creditors. Common examples of prohibited actions by creditors are contacting a debtor to demand repayment, taking action against a debtor to collect money owed to creditors or to take property of a debtor, and starting or continuing foreclosure actions or repossessions. If unauthorized actions are taken by a creditor against a debtor, the Court may penalize that creditor. A creditor who is considering taking action against a debtor or the property of a debtor should review section 362 of the Bankruptcy Code and may wish to seek legal advice. **The staff of the Clerk of the Bankruptcy Court is not permitted to give legal advice.**

MEETING OF CREDITORS. The Debtors' representative, as specified in Rule 9001(5) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), is required to appear at the meeting of creditors on the date and at the place set forth above for the purpose of being examined under oath. Attendance by creditors at the meeting is welcomed, but not required. At the meeting, the creditors may examine the Debtors and transact such other business as may properly come before the meeting. The meeting may be continued or adjourned from time to time by notice at the meeting, without further written notice to the creditors.

CLAIMS. Schedules of creditors will be filed pursuant to Bankruptcy Rule 1007. Any creditor holding a scheduled claim, which is not listed as disputed, contingent, or unliquidated as to amount, may, but is not required to, file a proof of claim in these cases. Creditors whose claims are not scheduled or whose claims are listed as disputed, contingent, or

unliquidated as to amount and who desire to participate in these cases or share in any distribution must file their proofs of claim. A creditor who desires to rely on the schedule of creditors has the responsibility for determining that the claim is listed accurately. **Separate notice of the deadlines to file proofs of claim and proofs of claim forms will be provided to the Debtors' known creditors.** Proof of claim forms also are available in the clerk's office of any bankruptcy court. Proof of claim forms are also available from the Court's web site at www.deb.uscourts.gov or may be obtained on the website of the Debtors' noticing and claims agent at www.kccllc.net/dbsi.

DISCHARGE OF DEBTS. Confirmation of a chapter 11 case may result in a discharge of debts, which may include all or part of your debt. See Bankruptcy Code § 1141(d). A discharge means that you may never try to collect the debt from the debtor, except as provided in the plan.

For the Court: /s/ David D. Bird
Clerk of the United States Bankruptcy Court

EXHIBIT B

FILED EFFECTIVE

251



ARTICLES OF ORGANIZATION LIMITED LIABILITY COMPANY

(Instructions on back of application)

 2006 JUL -7 AM 11:58
 SECRETARY OF STATE
 STATE OF IDAHO

1. The name of the limited liability company is:

DBSI TIEGS 979 LLC

2. The street address of the initial registered office is:

1550 South Tech Lane, Meridian, ID 83642

and the name of the initial registered agent at the above address is:

Douglas L. Swenson

3. The mailing address for future correspondence is:

1550 South Tech Lane, Meridian, ID 83642

4. Management of the limited liability company will be vested in:

Manager(s) ☐ or Member(s) ☒ (please check the appropriate box)

5. If management is to be vested in one or more manager(s), list the name(s) and address(es) of at least one initial manager. If management is to be vested in the member(s), list the name(s) and address(es) of at least one initial member.

Name

Address

DBSI Housing Inc, an Idaho

1550 South Tech Lane, Meridian, ID 83642

corporation

6. Signature of at least one person responsible for forming the limited liability company:

Signature: [Signature]

Typed Name: Douglas L. Swenson

Capacity: Pres. DBSI Housing Inc. Member

Signature: _____

Typed Name: _____

Capacity: _____

Secretary of State use only

IDaho Secretary of State

Revised 07/2002

Web Form

IDAHO SECRETARY OF STATE
 07/07/2006 05:00
 CK: 851326 CT: 172899 BH: 963851
 1 @ 100.00 = 100.00 ORGAN LLC # 2

W52401

EXHIBIT C

No. W 52401	Due no later than Jul 31, 2008 Annual Report Form		2. Registered Agent and Address (NO PO BOX)
Return to: SECRETARY OF STATE 700 WEST JEFFERSON PO BOX 83720 BOISE, ID 83720-0080 NO FILING FEE IF RECEIVED BY DUE DATE			DOUGLAS L SWENSON 1550 S TECH LN MERIDIAN ID 83642 3. <u>New</u> Registered Agent Signature:*
4. Limited Liability Companies: Enter Names and Addresses of at least one Member or Manager.			
Office Held	Name	Street or PO Address	City State Country Postal Code
MEMBER	DBSI HOUSING INC	1550 S TECH LN	MERIDIAN ID USA 83642
5. Organized Under the Laws of: ID W 52401	6. Annual Report must be signed.* Signature: Sandy Stern Date: 05/13/2008 Name (type or print): Sandy Stern Title: Executive Assistant		
Processed 05/13/2008		* Electronically provided signatures are accepted as original signatures.	

EXHIBIT D

FILED EFFECTIVE

**SECOND AMENDED AND RESTATED
ARTICLES OF INCORPORATION
OF
DBSI INC.**

08 MAR 26 PM 4:49

SECRETARY OF STATE
STATE OF IDAHO

Under the provisions of Sections 30-1-1006 and 30-1-1007 of the Idaho Business Corporation Act, DBSI Housing Inc. has adopted and executes the following Second Amended and Restated Articles of Incorporation:

1. **Name.** The name of the corporation is changed from DBSI Housing Inc. to DBSI Inc.
2. **Authorized shares.** The aggregate number of shares of capital stock which the corporation is authorized to issue is Four Hundred Thousand (400,000) shares of Voting Common Stock having no par value, and One Hundred Thousand (100,000) shares of Nonvoting Common Stock having no par value. Except as provided herein with respect to voting rights, each share of Voting Common Stock and Nonvoting Common Stock issued and outstanding shall be identical in all respects, and no dividends shall be paid on any share of the Voting Common Stock unless the same dividend is paid on all shares of the Nonvoting Common Stock outstanding at the time of such payment.
3. **Registered office and agent.** The registered office of the corporation is 1550 S. Tech Lane, Meridian, Idaho 83642 and its registered agent at that address is Douglas L. Swenson.
4. **Corporate purpose.** The purpose for which this corporation is organized is the transaction of any and all lawful business for which corporations may be incorporated under the Idaho Business Corporation Act.
5. **Board of Directors.** All corporate powers shall be exercised by or under the authority of, and the business and affairs of the corporation managed under the direction of, its board of directors, subject to any limitation set forth in a shareholder agreement authorized under section 30-1-732, Idaho Code. The number of directors of the corporation shall be fixed from time to time by or in the manner provided in the bylaws.
6. **Voting.** The voting power will be vested exclusively in the Voting Common Stock, and each outstanding share of Voting Common Stock will be entitled to one (1) vote in person or by written proxy at all annual or special meetings of the of the corporation, or on matters in which the shareholders are entitled to vote. Shareholders do not have the right to cumulate their votes for directors.
7. **Indemnification.** The corporation shall indemnify the directors and officers of the corporation to the fullest extent permitted by the Idaho Business Corporation Act,

IDAHO SECRETARY OF STATE
03/27/2008 05:00
1515117 CT: 172899 BH: 1106853
1 30.00 = 30.00 AMEND PROF # 8
1 20.00 = 20.00 EXPEDITE C # 9

SECOND AMENDED AND RESTATED ARTICLES OF INCORPORATION

063238

as the same exists or may hereafter be amended (but, in the case of any such amendment, only to the extent that such amendment permits the corporation to provide broader indemnification rights than the Idaho Business Corporation Act permitted the corporation to provide prior to such amendment).

8. **Limitation of Liability.** No director shall be liable to the corporation or its shareholders for monetary damages for breach of fiduciary duty except liability for: (i) the amount of a financial benefit received by a director to which he is not entitled; (ii) an intentional infliction of harm on the corporation or the shareholders; (iii) a violation of § 30-1-833, Idaho Code; or (iv) an intentional violation of criminal law.

DATED effective as of the 1st day of April, 2008.

DBSI INC.

By 

Charles E. Hassard, Secretary

SECOND AMENDED AND RESTATED ARTICLES OF INCORPORATION - 2

**CERTIFICATE TO BE FILED WITH
SECOND AMENDED AND RESTATED ARTICLES OF INCORPORATION**

Under the provisions of Section 30-1-1007 and 30-1-1006 of the Idaho Business Corporation Act, DBSI Housing Inc. (the "Corporation") certifies:

1. The name of the Corporation is changed from DBSI Housing Inc., to DBSI Inc.
2. The Second Amended and Restated Articles of Incorporation (the "Amendment") were adopted on March 25, 2008 and shall be effective April 1, 2008.
3. The Amendment was duly approved, as required by Section 30-1-1003 of the Idaho Business Corporation Act, by majority vote of the shareholders at the joint annual meeting of the shareholders and directors of the Corporation held March 25, 2008, upon proper notice, duly delivered to all of the shareholders and all of the directors of the Corporation at which meeting a quorum of the shareholders was present.
4. The Second Amended and Restated Articles of Incorporation consolidate all amendments into a single document and supersede the original article of incorporation and all amendments thereto.

DATED this 25 day of March, 2008.

DBSI INC.

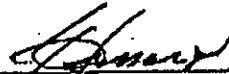
By: 
Charles E. Hassard, Secretary

EXHIBIT E

Dylan Lawrence

From: Dylan Lawrence
Sent: Monday, November 17, 2008 4:44 PM
To: 'david.barber@ag.idaho.gov'
Cc: Scott Campbell; Debby Long; Lela Wood
Subject: Discovery responses of DBSI Tiegs 979, LLC

Hello, David.

As we discussed earlier today, I am requesting an extension of 30 days for claimant DBSI Tiegs 979, LLC to respond to the State of Idaho's discovery requests in subcases 63-3163 and 63-3274. I believe the current deadline in effect for responding to those requests is Monday, November 24, which would make the new deadline Wednesday, December 24. As I explained, the claimant's parent company and several subsidiaries recently filed for bankruptcy protection, and I am still waiting for confirmation from the client on how the bankruptcy stay affects our participation in these subcases. If you agree to this extension, then the claimant agrees not oppose the State's efforts to seek additional time for discovery, if that proves necessary due to delay caused by this extension. Please confirm if you agree to this arrangement.

Thank you,
Dylan

Dylan Lawrence
Moffatt Thomas Barrett Rock & Fields, Chtd.
P.O. Box 829
Boise, Idaho 83701-0829
Phone & fax: (208) 385-5417

EXHIBIT F

Dylan Lawrence

From: Barber, David [david.barber@ag.idaho.gov]
Sent: Thursday, November 20, 2008 10:01 AM
To: Dylan Lawrence
Subject: RE: Discovery responses of DBSI Tiegs 979, LLC

Dear Dylan:

Your proposal is acceptable. I apologize for not getting back to you sooner.

Sincerely,

David J. Barber

-----Original Message-----

From: Dylan Lawrence [mailto:DBL@moffatt.com]
Sent: Monday, November 17, 2008 4:44 PM
To: Barber, David
Cc: Scott Campbell; Debby Long; Lela Wood
Subject: Discovery responses of DBSI Tiegs 979, LLC

Hello, David.

As we discussed earlier today, I am requesting an extension of 30 days for claimant DBSI Tiegs 979, LLC to respond to the State of Idaho's discovery requests in subcases 63-3163 and 63-3274. I believe the current deadline in effect for responding to those requests is Monday, November 24, which would make the new deadline Wednesday, December 24. As I explained, the claimant's parent company and several subsidiaries recently filed for bankruptcy protection, and I am still waiting for confirmation from the client on how the bankruptcy stay affects our participation in these subcases. If you agree to this extension, then the claimant agrees not oppose the State's efforts to seek additional time for discovery, if that proves necessary due to delay caused by this extension. Please confirm if you agree to this arrangement.

Thank you,
Dylan

Dylan Lawrence
Moffatt Thomas Barrett Rock & Fields, Chtd.
P.O. Box 829
Boise, Idaho 83701-0829
Phone & fax: (208) 385-5417

NOTICE: This e-mail, including attachments, constitutes a confidential attorney-client communication. It is not intended for transmission to, or receipt by, any unauthorized persons. If you have received this communication in error, do not read it. Please delete it from your system without copying it, and notify the sender by reply e-mail or by calling (208) 345-2000, so that our address record can be corrected. Thank you.

NOTICE: To comply with certain U.S. Treasury regulations, we inform you that, unless expressly stated otherwise, any U.S. federal tax advice contained in this e-mail, including attachments, is not intended or written to be used, and cannot be used, by any person for the purpose of avoiding any penalties that may be imposed by the Internal Revenue Service.

EXHIBIT G



RECEIVED

DEC 16 2008

MOFFATT, THOMAS, BARRETT,
ROCK & FIELDS, CHTD.

STATE OF IDAHO
OFFICE OF THE ATTORNEY GENERAL
LAWRENCE G. WASDEN

December 15, 2008

VIA U.S. MAIL AND
FACSIMILE (208) 385-5384

Mr. Dylan B. Lawrence
Moffat Thomas Barrett Rock &
Fields, CHTD.
101 S. Capitol Blvd., 10th Floor
P.O. Box 829
Boise, Idaho 83701-0829

Re: SRBA Subcase Nos. 63-03163 and 63-03274. MTBR&F File No. 00UFO.5432.

Dear Mr. Lawrence:

Enclosed is a copy of a document that I obtained from the U. S. Bankruptcy Court in Idaho. The document establishes that DBSI, Inc., *et al.*, filed for bankruptcy protection in the U.S. Bankruptcy Court for the District of Delaware. The claimant in subcase nos. 63-03163 and 63-03274, DBSI TIEGS 979 LLC, is an Idaho Limited Liability Company. It is not listed as a debtor in the filing in Delaware; it is not listed as a debtor in a bankruptcy proceeding commenced in Idaho. Accordingly, your statements to me that the claimant of subcase nos. 63-03163 and 63-03274 was in bankruptcy proceedings were inaccurate, and there appears to be no basis for the indefinite postponement of answers to the discovery.

On Monday, December 22, 2008, I intend to file a *Motion to Compel Discovery and Request for Sanctions* based on your reckless statements of fact. If I receive a complete answer to the discovery that I served by 5:00 p.m. on Friday, December 19, 2008, I will not file these papers.

Sincerely,

A handwritten signature in cursive script, reading "David J. Barber".

DAVID J. BARBER
Deputy Attorney General

DJB/pb

Encl.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

NOV 24 2008

In re:

DBSI, INC., *et al.*,

Debtors.

Chapter 11

Case No. 08-12687 (PJW)

Jointly Administered

Received _____ Filed _____ Time _____
CAMERON S. BURKE
CLERK, DISTRICT COURT

**NOTICE OF COMMENCEMENT OF CHAPTER 11 BANKRUPTCY
CASES, MEETING OF CREDITORS AND FIXING OF CERTAIN DATES**

On November 6 and 10, 2008, DBSI, Inc., *et al.*, the debtors and debtors-in-possession in the above-captioned jointly administered cases (collectively, the "Debtors"), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the "Bankruptcy Code"). The Debtors and their respective addresses, case numbers and federal tax identification numbers are as follows:

DEBTORS	ADDRESS	OTHER NAMES (Other names used by the Debtors in the last 8 years)	CASE NO.	EIN
One-Executive Tower LLC ¹	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12666	82-0355037*
DBSI Inc.	1550 S. Tech Lane Meridian, ID 83642		08-12687	82-0355037
DBSI South 75 Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12688	20-2704298
DBSI 14001 Weston Parkway LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12689	20-2256264
DBSI CP Ironwood LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12690	82-0355037*
DBSI Lake Ellenor LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12691	82-0355037*
DBSI 12 South Place LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12692	82-0355037*
DBSI 13000 Weston Parkway LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12693	20-2256231
DBSI 2001A Funding Corporation	1550 S. Tech Lane Meridian, ID 83642		08-12694	82-0355037*

¹ One-Executive Tower LLC filed a voluntary petition for relief on November 6, 2008; all other Debtors listed herein filed voluntary petitions on November 10, 2008.

* The EIN listed on the voluntary petition for certain Debtors is the EIN for the entity that is responsible for that Debtor's taxable income. As certain Debtors are disregarded entities for tax purposes, those Debtors do not maintain their own EIN.

DEBTORS	ADDRESS	OTHER NAMES (Other names used by the Debtors in the last 8 years)			CASE NO.	EIN
DBSI 2001B Funding Corporation	1550 S. Tech Lane Meridian, ID 83642				08-12695	82-0355037*
DBSI 2001C Funding Corporation	1550 S. Tech Lane Meridian, ID 83642				08-12696	82-0355037*
DBSI 2005 Secured Notes Corporation	1550 S. Tech Lane Meridian, ID 83642				08-12697	20-3223353
DBSI 2006 Secured Notes Corporation	1550 S. Tech Lane Meridian, ID 83642				08-12698	20-5544489
DBSI 2008 Notes Corporation	1550 S. Tech Lane Meridian, ID 83642				08-12699	26-1649963
DBSI 2nd Street Quad LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12700	82-0355037*
DBSI 700 Locust LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12701	82-0355037*
DBSI Abbotts Bridge LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12702	82-0355037*
DBSI Allison Pointe LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12703	82-0355037*
DBSI Amarillo Apartments LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12704	20-2019186
DBSI Anna Plaza LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12705	82-0355037*
DBSI Arlington Town Square LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12706	82-0355037*
DBSI Arrowhead LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12707	82-0355037*
DBSI Avenues North Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12708	82-0355037*
DBSI Bandera Trails LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12709	82-0355037*
DBSI Battlefield Station LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12710	82-0355037*
DBSI Belton Town Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12711	82-0355037*
DBSI Breckinridge LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12712	82-0355037*

DEBTORS	ADDRESS	OTHER NAMES (Other names used by the Debtors in the last 8 years)		
		CASE NO.		EIN
DBSI Brendan Way LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12713	82-0355037*
DBSI Brookfield Pelham LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12714	82-0355037*
DBSI Cambridge Place LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12715	82-0355037*
DBSI Carolina Commons LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12716	82-0355037*
DBSI Cedar East and Cypress LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12717	20-2187873
DBSI Clear Creek Square LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12718	20-2377296
DBSI Corporate Woods LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12719	20-2033818
DBSI CP Clearwater LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12720	82-0355037*
DBSI Cranberry LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12721	82-0355037*
DBSI Cross Pointe LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12722	82-0355037*
DBSI Crosstown Woods LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12723	20-2505092
DBSI Daniel Burnham LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12724	20-2070664
DBSI Decatur LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12725	20-2070700
DBSI Eagles Landing LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12726	20-2741896
DBSI Embassy Tower LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12727	82-0355037*
DBSI Executive Dr LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12728	82-0355037*
DBSI Executive Park LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12729	20-2261886

DEBTORS	ADDRESS	OTHER NAMES (Other names used by the Debtors in the last 8 years)		
		CASE NO.		EIN
DBSI Fairlane Green LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12730	82-0355037*
DBSI Fairway LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12731	82-0355037*
DBSI Florissant Market Place LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12732	82-0355037*
DBSI Gadd Crossing LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12733	82-0355037*
DBSI Ghent Road LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12734	82-0355037*
DBSI Grant Street Portfolio LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12735	82-0355037*
DBSI Green Street Commons LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12736	82-0355037*
DBSI Guaranteed Capital Corporation	1550 S. Tech Lane Meridian, ID 83642		08-12737	82-0355037*
DBSI Hampton LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12738	82-0355037*
DBSI Hickory Plaza LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12739	82-0355037*
DBSI Highlands & Southcreek LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12740	82-0355037*
DBSI Houston Levee Galleria LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12741	82-0355037*
DBSI Kemper Pointe LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12742	82-0355037*
DBSI Kenwood Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12743	20-2505066
DBSI Keystone Commerce LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12744	82-0355037*
DBSI Lake Natoma LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12745	82-0355037*
DBSI Lamar LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12746	82-0355037*

DEBTORS	ADDRESS	OTHER NAMES (Other names used by the Debtors in the last 8 years)		
		CASE NO.		EIN
DBSI Landmark Towers Leaseco LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12747	82-0355037*
DBSI Lifestyle Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12748	82-0355037*
DBSI Lincoln Park 10 LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12749	82-0355037*
DBSI Mansell Forest LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12750	82-0355037*
DBSI Mansell Place LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12751	82-0355037*
DBSI Master Leaseco, Inc.	1550 S. Tech Lane Meridian, ID 83642		08-12752	20-2070548
DBSI Meadow Chase Apartments LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12753	82-0355037*
DBSI Megan Crossings LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12754	82-0355037*
DBSI Metropolitan Square LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12755	82-0355037*
DBSI Missouri LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12756	20-2256200
DBSI Network LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12757	20-2070356
DBSI North Logan Retail Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12758	82-0355037*
DBSI North Park LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12759	20-1979200
DBSI North Stafford LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12760	82-0355037*
DBSI Northlite Commons II LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12761	82-0355037*
DBSI Northpark Ridgeland LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12762	82-0355037*
DBSI Northridge LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12763	20-2185392

DEBTORS	ADDRESS	OTHER NAMES (Other names used by the Debtors in the last 8 years)			CASE NO.	EIN
DBSI Oakwood Plaza LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12764	82-0355037*
DBSI Old National Town Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12765	82-0355037*
DBSI One Executive Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12766	82-0355037*
DBSI One Hanover LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12767	20-1444404
DBSI Park Creek-Gainesville LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12768	82-0355037*
DBSI Parkway III LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12769	82-0355037*
DBSI Peachtree Corners Pavilion LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12770	82-0355037*
DBSI Phoenix Peak LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12771	82-0355037*
DBSI Pinehurst Square East LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12772	82-0355037*
DBSI Pinehurst Square West LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12773	82-0355037*
DBSI Plano Tech Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12774	20-2376346
DBSI Portofino Tech Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12775	82-0355037*
DBSI Properties Inc.	1550 S. Tech Lane Meridian, ID 83642				08-12776	20-3349713
DBSI Real Estate Funding Corporation	1550 S. Tech Lane Meridian, ID 83642				08-12777	82-0355037*
DBSI Realty Inc.	1550 S. Tech Lane Meridian, ID 83642				08-12778	82-0372831
DBSI Road 68 Retail Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12779	82-0355037*
DBSI Sam Houston Tech Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12780	82-0355037*
DBSI Sapphire Pointe LeaseCo LLC	12426 W. Explorer Drive, Suite 220				08-12781	82-0355037*

DEBTORS	ADDRESS	OTHER NAMES (Other names used by the Debtors in the last 8 years)		
		CASE NO. EIN		
	Boise, ID 83713			
DBSI Securities Corporation	1550 S. Tech Lane Meridian, ID 83642		08-12782	82-0350370
DBSI Sherwood Plaza LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12783	82-0355037*
DBSI Shoppes at Misty Meadows LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12784	82-0355037*
DBSI Shoppes at Trammel LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12785	82-0355037*
DBSI Signature Place LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12786	82-0355037*
DBSI Silver Lakes Leaseco LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12787	82-0355037*
DBSI Southport Pavilion LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12788	82-0355037*
DBSI Spalding Triangle LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12789	82-0355037*
DBSI Spring Valley Road LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12790	20-2610702
DBSI Springville Corner Leaseco LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12791	82-0355037*
DBSI ST Tower LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12792	82-0355037*
DBSI St. Andrews Place LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12793	82-0355037*
DBSI Stone Glen Village LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12794	82-0355037*
DBSI Stony Brook South LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12795	82-0355037*
DBSI Streetside at Towne Lake LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12796	82-0355037*
DBSI Topsham Fair Mall LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12797	82-0355037*

DEBTORS	ADDRESS	OTHER NAMES (Other names used by the Debtors in the last 8 years)			CASE NO.	EIN
DBSI Torrey Chase LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12798	82-0355037*
DBSI Treasure Valley Business Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12799	82-0355037*
DBSI Trinity Ridge Business Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12800	82-0355037*
DBSI University Park LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12801	82-0355037*
DBSI Vantage Drive LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12802	20-1255705
DBSI Watkins LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12803	20-2070283
DBSI West Oaks Square LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12804	82-0355037*
DBSI Wilson Estates LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12805	82-0355037*
DBSI Winchester Office LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12806	82-0355037*
DBSI Windcom Court LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12807	82-0355037*
DBSI Wisdom Pointe LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12808	82-0355037*
DBSI Woodlands Medical Office I LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12809	82-0355037*
DBSI Woodside Center LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12810	82-0355037*
DCJ Inc.	1550 S. Tech Lane Meridian, ID 83642				08-12811	82-0351881
DBSI Draper LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713				08-12812	82-0355037*
FOR 1031 LLC	1550 S. Tech Lane Meridian, ID 83642				08-12813	20-0184991
Spectrus Real Estate Inc.	1550 S. Tech Lane Meridian, ID 83642				08-12814	82-0355037*
DBSI Academy Park Loop LeaseCo LLC	12426 W. Explorer Drive, Suite 220				08-12815	82-0355037*

DEBTORS	ADDRESS	OTHER NAMES (Other names used by the Debtors in the last 8 years)		
		CASE NO.		EIN
	Boise, ID 83713			
DBSI Copperfield Timbercreek LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12816	82-0355037*
DBSI Corporate Center II LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12817	82-0355037*
DBSI Executive Plaza LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12818	82-0355037*
DBSI Northgate LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12819	82-0355037*
DBSI Two Notch Rd. LeaseCo LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12820	20-2741869
DBSI Asset Management LLC	1550 S. Tech Lane Meridian, ID 83642		08-12821	82-0355037*
DBSI 2006 Land Opportunity Fund LLC	1550 S. Tech Lane Meridian, ID 83642		08-12822	20-5347758*
DBSI Shoppes at Trammel LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12823	82-0355037*
DBSI 2007 Land Improvement & Development Fund LLC	1550 S. Tech Lane Meridian, ID 83642		08-12824	20-5432982
DBSI 2008 Land Option Fund LLC	1550 S. Tech Lane Meridian, ID 83642		08-12825	20-5390673
DBSI Alma/121 Office Commons LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12826	20-5347758*
DBSI Cottonwood Plaza Development LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12827	20-5347758*
DBSI Draper Technology 21 LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12828	20-4679604*
DBSI Escala LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12829	82-0355037*
DBSI Short-Term Development Fund LLC	1550 S. Tech Lane Meridian, ID 83642		08-12830	82-0355037
DBSI Telecom Office LLC	12426 W. Explorer Drive, Suite 220 Boise, ID 83713		08-12831	73-1676718
DBSI Discovery Real Estate Services LLC	1550 S. Tech Lane Meridian, ID 83642	DDRS and DBSI	08-12834	20-2411648

DATE, TIME AND LOCATION OF MEETING OF CREDITORS: FRIDAY, DECEMBER 19, 2008 AT 10:00 A.M. (ET), 2ND FLOOR, ROOM 2112, J. CALEB BOGGS FEDERAL BUILDING, 844 NORTH KING STREET, WILMINGTON, DELAWARE.

DEADLINE TO FILE A PROOF OF CLAIM. Notice of this deadline will be sent by and through a separate notice.

NAME, ADDRESS AND TELEPHONE NUMBER OF TRUSTEE. None appointed to date.

COUNSEL FOR THE DEBTORS:

James L. Patton, Jr., Esq.
Michael R. Nestor, Esq.
Joseph M. Barry, Esq.
Kenneth J. Enos, Esq.
Young Conaway Stargatt & Taylor, LLP
1000 West Street, 17th Floor
P.O. Box 391
Wilmington, DE 19899
Telephone: (302) 576-3572

COMMENCEMENT OF CASES. A petition for reorganization under chapter 11 of the Bankruptcy Code has been filed in this Court by each of the Debtors listed above, and orders for relief have been entered. You will not receive notice of all documents filed in these cases. All documents filed with the Court, including lists of the Debtors' property and debts, are available for inspection at the Office of the Clerk of the Bankruptcy Court. In addition, such documents may be available at www.deb.uscourts.gov or www.kccllc.net/dbsi.

PURPOSE OF CHAPTER 11 FILING. Chapter 11 of the Bankruptcy Code enables a debtor to reorganize pursuant to a plan. A plan is not effective unless approved by the Court at a confirmation hearing. Creditors will be given notice concerning any plan, or in the event these cases are dismissed or converted to another chapter of the Bankruptcy Code. The Debtors will remain in possession of their property and will continue to operate any business unless a trustee is appointed.

CREDITORS MAY NOT TAKE CERTAIN ACTIONS. A creditor is anyone to whom a debtor owes money or property. Under the Bankruptcy Code, a debtor is granted certain protection against creditors. Common examples of prohibited actions by creditors are contacting a debtor to demand repayment, taking action against a debtor to collect money owed to creditors or to take property of a debtor, and starting or continuing foreclosure actions or repossessions. If unauthorized actions are taken by a creditor against a debtor, the Court may penalize that creditor. A creditor who is considering taking action against a debtor or the property of a debtor should review section 362 of the Bankruptcy Code and may wish to seek legal advice. The staff of the Clerk of the Bankruptcy Court is not permitted to give legal advice.

MEETING OF CREDITORS. The Debtors' representative, as specified in Rule 9001(5) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), is required to appear at the meeting of creditors on the date and at the place set forth above for the purpose of being examined under oath. Attendance by creditors at the meeting is welcomed, but not required. At the meeting, the creditors may examine the Debtors and transact such other business as may properly come before the meeting. The meeting may be continued or adjourned from time to time by notice at the meeting, without further written notice to the creditors.

CLAIMS. Schedules of creditors will be filed pursuant to Bankruptcy Rule 1007. Any creditor holding a scheduled claim, which is not listed as disputed, contingent, or unliquidated as to amount, may, but is not required to, file a proof of claim in these cases. Creditors whose claims are not scheduled or whose claims are listed as disputed, contingent, or

unliquidated as to amount and who desire to participate in these cases or share in any distribution must file their proofs of claim. A creditor who desires to rely on the schedule of creditors has the responsibility for determining that the claim is listed accurately. **Separate notice of the deadlines to file proofs of claim and proofs of claim forms will be provided to the Debtors' known creditors.** Proof of claim forms also are available in the clerk's office of any bankruptcy court. Proof of claim forms are also available from the Court's web site at www.deb.uscourts.gov or may be obtained on the website of the Debtors' noticing and claims agent at www.kccllc.net/dbsi.

DISCHARGE OF DEBTS. Confirmation of a chapter 11 case may result in a discharge of debts, which may include all or part of your debt. See Bankruptcy Code § 1141(d). A discharge means that you may never try to collect the debt from the debtor, except as provided in the plan.

For the Court: /s/ David D. Bird
Clerk of the United States Bankruptcy Court

EXHIBIT H

Moffatt Thomas

MOFFATT THOMAS BARRETT ROCK & FIELDS, CHTD.

Boise
Idaho Falls
Pocatello
Twin Falls

Eugene C. Thomas
John W. Barrett
R. B. Rock
Richard C. Fields
John S. Simko
John C. Ward
D. James Manning
David B. Lincoln
Gary T. Dance
Larry C. Hunter
Randall A. Peterman
Mark S. Prusynski
Stephen R. Thomas
Glenna M. Christensen
Gerald T. Husch
Scott L. Campbell
Robert B. Burns

Michael E. Thomas
Patricia M. Olsson
Christine E. Nicholas
Bradley J. Williams
Lee Radford
Michael O. Roe
Nancy J. Garrett
David S. Jensen
James L. Martin
C. Clayton Gill
Michael W. McGreaham
David P. Gardner
Tara Martens
Mark C. Peterson
Julian E. Gabiola
Kimberly D. Evans Ross
Jason G. Murray

Jon A. Stenquist
Tyler J. Anderson
Paul D. McFarlane
Tyler J. Henderson
C. Edward Cather III
Michelle C. Michaud *
Andrew J. Waldera
Dylan B. Lawrence
Benjamin C. Ritchie
Rebecca A. Rainey
Matthew J. McGee
* licensed in WA, ID application pending
Robert E. Bakes, of counsel
Willis C. Moffatt, 1907-1980
Kirk R. Helvie, 1956-2003

US Bank Plaza Building
101 S Capitol Blvd 10th Fl
PO Box 829
Boise Idaho 83701 0829

208 345 2000
800 422 2889
208 385 5384 Fax
www.moffatt.com

December 16, 2008
via Facsimile
(208) 334-2690
and U.S. Mail

David J. Barber
Idaho Attorney General's Office
210 Statehouse
P.O. Box 83720
Boise, ID 83720-0010

Re: **Discovery Responses in SRBA Subcase Nos. 63-3163 and 63-3274**
(DBSI Tiegs 979, LLC)
MTBR&F File No. 23255.0001

Dear David:

I am responding to your letter of December 15, 2008, in which you accuse me of making "inaccurate" and "reckless" statements regarding the bankruptcy status of DBSI Tiegs 979, LLC ("Claimant"). I am attaching to this letter e-mail correspondence between you and me. As you will see, my e-mail to you of November 17, 2008, specifically states that "the claimant's parent company and several subsidiaries recently filed for bankruptcy protection." Nowhere in that e-mail do I state that the Claimant itself was covered by the bankruptcy petition. While I know we also spoke about this issue via telephone on that same day, I seriously doubt that I ever specifically represented that the Claimant itself was covered in the original bankruptcy petition, as I have been aware all along of the curious omission of that particular entity from the petition.

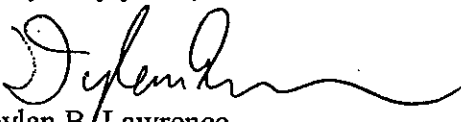
More fundamentally, your accusation and the overall tone of your letter ignore the reality that the recent tumult and layoffs at the Claimant's parent company are making it difficult to respond to the discovery requests at this time. The Claimant is a member-managed limited liability company, with control of the company vested in DBSI, Inc.—the second entity identified in the petition you attached to your letter.¹ Your letter's focus upon the Claimant's absence from the petition ignores this important fact.

¹ I will note that the Claimant's most recent annual report on file with the Idaho Secretary of State identifies "DBSI Housing, Inc." as the member-manager of the Claimant. After that annual report was processed by the Secretary of State, DBSI Housing, Inc. officially changed its name to DBSI, Inc. This explains that discrepancy.

David J. Barber
December 16, 2008
Page 2

In your letter, you refer to an "indefinite" postponement of the discovery deadline, and you state that you plan to file a motion to compel discovery on Monday, December 22, 2008, if you do not receive a complete response to the discovery requests by December 19, 2008. If that is your decision, then I cannot stop you. However, given that we specifically agreed in writing that the new deadline for responding would be December 24, 2008, I am confused as to how you came up with these arbitrary dates, and why you describe the deadline as "indefinite."

Very truly yours,



Dylan B. Lawrence

DBL/llw

Attachment

cc: Scott L. Campbell

Dylan Lawrence

From: Barber, David [david.barber@ag.idaho.gov]
Sent: Thursday, November 20, 2008 10:01 AM
To: Dylan Lawrence
Subject: RE: Discovery responses of DBSI Tiegs 979, LLC

Dear Dylan:

Your proposal is acceptable. I apologize for not getting back to you sooner.

Sincerely,

David J. Barber

-----Original Message-----

From: Dylan Lawrence [mailto:DBL@moffatt.com]
Sent: Monday, November 17, 2008 4:44 PM
To: Barber, David
Cc: Scott Campbell; Debby Long; Lela Wood
Subject: Discovery responses of DBSI Tiegs 979, LLC

Hello, David:

As we discussed earlier today, I am requesting an extension of 30 days for claimant DBSI Tiegs 979, LLC to respond to the State of Idaho's discovery requests in subcases 63-3163 and 63-3274. I believe the current deadline in effect for responding to those requests is Monday, November 24, which would make the new deadline Wednesday, December 24. As I explained, the claimant's parent company and several subsidiaries recently filed for bankruptcy protection, and I am still waiting for confirmation from the client on how the bankruptcy stay affects our participation in these subcases. If you agree to this extension, then the claimant agrees not oppose the State's efforts to seek additional time for discovery, if that proves necessary due to delay caused by this extension. Please confirm if you agree to this arrangement.

Thank you,
Dylan

Dylan Lawrence
Moffatt Thomas Barrett Rock & Fields, Chtd.
P.O. Box 829
Boise, Idaho 83701-0829
Phone & fax: (208) 385-5417

NOTICE: This e-mail, including attachments, constitutes a confidential attorney-client communication. It is not intended for transmission to, or receipt by, any unauthorized persons. If you have received this communication in error, do not read it. Please delete it from your system without copying it, and notify the sender by reply e-mail or by calling (208) 345-2000, so that our address record can be corrected. Thank you.

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EXHIBIT I



RECEIVED

DEC 18 2008

MOFFATT, THOMAS, BARRETT,
ROCK & FIELDS, CHTD.

STATE OF IDAHO
OFFICE OF THE ATTORNEY GENERAL
LAWRENCE G. WASDEN

December 17, 2008

VIA U.S. MAIL AND
FACSIMILE (208) 385-5384

Mr. Dylan B. Lawrence
Moffat Thomas Barrett Rock &
Fields, CHTD.
101 S. Capitol Blvd., 10th Floor
P.O. Box 829
Boise, Idaho 83701-0829

Re: SRBA Subcase Nos. 63-03163 and 63-03274. MTBR&F File No. 00UFO.5432.

Dear Mr. Lawrence:

This letter is in response to your letter dated December 16, 2008 received at 5:19 p.m. It is evident to me that I did not understand the facts at the time of our discussion on November 17, 2008. I would not have agreed to any extension, if I had my present understanding of the facts. I evidently misplaced your e-mail of that date and my response, which confirmed the extension of the deadline to December 24, 2008. I will honor that date. Thank you for sending a copy to me. I apologize for sending the letter dated December 15, 2008.

Sincerely,

A handwritten signature in cursive script, reading "David J. Barber".

DAVID J. BARBER
Deputy Attorney General

DJB/ov