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DEPARTMENT OF
WATER RESOURCES

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Attorney for Raymond C. Barker, Jr.
Charles J. Kritz and Diane B. Kritz

**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT
OF THE STATE OF IDAHO, IN AND FOR TWIN FALLS COUNTY**

In Re SRBA

Case No. 39576

Subcase No. 2-2318A

**NOTICE OF TAKING DEPOSITION
DUCES TECUM
(PEGGY JACKSON)**

**TO: WILLIAM WILKERSON, SR. AND IMOGENE WILKERSON,
CLAIMANTS, AND THEIR COUNSEL OF RECORD, JON GOULD**

PLEASE TAKE NOTICE that Objectors Raymond C. Barker, Jr., Charles Kritz and Diane Kritz, by and through their counsel of record, Debra K. Ellers, will take the deposition upon oral examination of PEGGY JACKSON, commencing at 10 a.m. on April 8, 2010, at the Snake River RV Resort, at 3028 River Road, Homedale, Idaho, before M & M Court Reporters or some other officer authorized

to administer oaths. This deposition will continue from day to day until completed, and shall be recorded by audio-visual means. All parties to the above-identified case are invited to attend and participate in the manner provided for in the Idaho Rules of Civil Procedure.

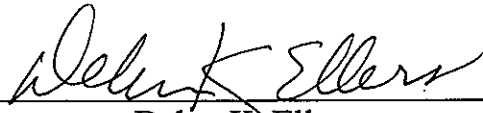
Pursuant to Rule 30(b)(5), I.R.C.P, the deponent is required to bring with her to said deposition all documents¹ for inspection and copying that relate in any way to Idaho Water Right No. 2-2318, including, but not limited to, the following documents:

1. All documents relating to the extent of use, or non-use, of Water Right No. 2-2318 on the 13 acre parcel south of the old railroad right of way any time during your or your son's ownership of that land.
2. All documents relating to your and your husband's sale of the 13 acre parcel south of the old railroad right of way to the Wittrocks in about the year 1991.
3. All documents relating to the Wittrocks' use, or non-use, of the Snake River pumping station on the riverfront parcel.
4. All documents relating to the Wittrocks' request of an easement across the riverfront parcel from the Snake River pumping station and your and your husband's response to such request.

¹ Definition: The term "document," as used herein, means all writings of every kind, including, but not limited to, the original of all records, letters, correspondence, notes, diaries, statements, invoices, reports, memoranda, phone logs, minutes, contracts, or other documents within the deponent's control or possession, of which the deponent has knowledge or access, or which any of the deponent's agents, accountants, attorneys or other representatives have in their control or possession.

5. All documents relating to your and your husband's sale of the approximately 37 acre riverfront parcel to the Harlans in about the year 1992.

RESPECTFULLY SUBMITTED this 5th day of March, 2010.

By 
Debra K. Ellers
ATTORNEY AT LAW

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of March, 2010, I caused to be served a copy of the foregoing document on the following by the method indicated below:

Jon Gould
Ringert Clark
P.O. Box 2773
Boise, Idaho 83701-2773
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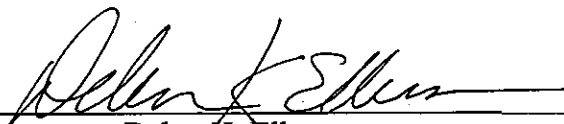
☒ U.S. Mail ☐ Overnight Delivery ☐ Hand-Delivery ☐ Facsimile

Director of IDWR
PO Box 87320
Boise, Idaho 83720-0098

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Debra K. Ellers