

DEPARTMENT OF
WATER RESOURCES

Attorneys for Claimant and Objector
Pioneer Irrigation District

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Andrew J. Waldera, ISB No. 6608
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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.	63-00166A	63-00166B
	63-00167A	63-00167B
	63-00179A	63-00179C
	63-32580	

AFFIDAVIT OF JENNIFER STEVENS, PH.D.

[illegible]

Jennifer Stevens, Ph.D., having been duly sworn upon oath, deposes and states as follows:

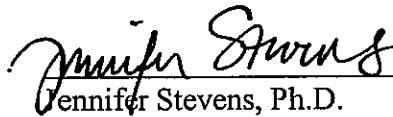
1. I am over 18 years of age and I make this affidavit based upon my own personal knowledge.

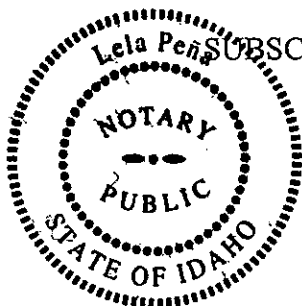
2. I have been retained by Pioneer as an expert witness regarding historical research matters in the above-captioned matter. I hold a Ph.D. in American History; a Master of Arts Degree in American History; and a Bachelor of Arts Degree in both History and Political Science. Attached as Exhibit A hereto is a true and correct copy of my curriculum vitae.

3. Attached hereto as Exhibit B is a true and correct copy of a map dated March 1900 and entitled "Map to Accompany Plan of the Pioneer Irrigation District for the Construction of Works and the Acquisition of Property in Canyon and Ada Counties, Idaho." I obtained this map from collection "AR 20" at the Research Center at the Idaho State Archives offices located at 2205 Old Penitentiary Road Boise, Idaho 83712. That collection contains historical documents of what was previously known as the Idaho Department of Reclamation.

4. Attached hereto as Exhibit C is a true and correct copy of a "Map of the Pioneer Irrigation District" dated May 18, 1901. I obtained this map from the Commissioners' Minutes in the Canyon County Recorder's office located at 1115 Albany St., Caldwell, Idaho 83605.

Further your affiant sayeth naught.


Jennifer Stevens, Ph.D.



SUBSCRIBED AND SWORN to before me this 24th day of September, 2010.


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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of September, 2010, I caused a true and correct copy of the foregoing **AFFIDAVIT OF JENNIFER STEVENS, PH.D.** to be served by the method indicated below, and addressed to the following:

Mason Creek Ditch Company
Represented by:
Albert P Barker
BARKER ROSHOLT & SIMPSON LLP
1010 W. Jefferson, STE 102
P.O. Box 2139
Boise, ID 83701-2139

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

Franklin Ditch Co.
Represented by:
Jon C. Gould
Daniel V. Steenson
Ringert Clark Chartered
P.O. Box 2773
Boise, ID 83701

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

Martin Galvin
P.O. Box 115
Middleton, ID 83644

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

John J. McEvoy
1703 N. KCID Road
Caldwell, ID 83605

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

Director
IDAHO DEPARTMENT OF WATER RESOURCES
322 E. Front Street, 6th Floor
P.O. Box 83720
Boise, ID 83720

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

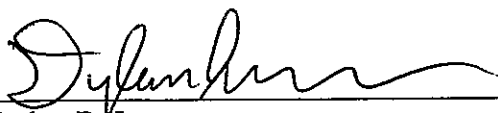
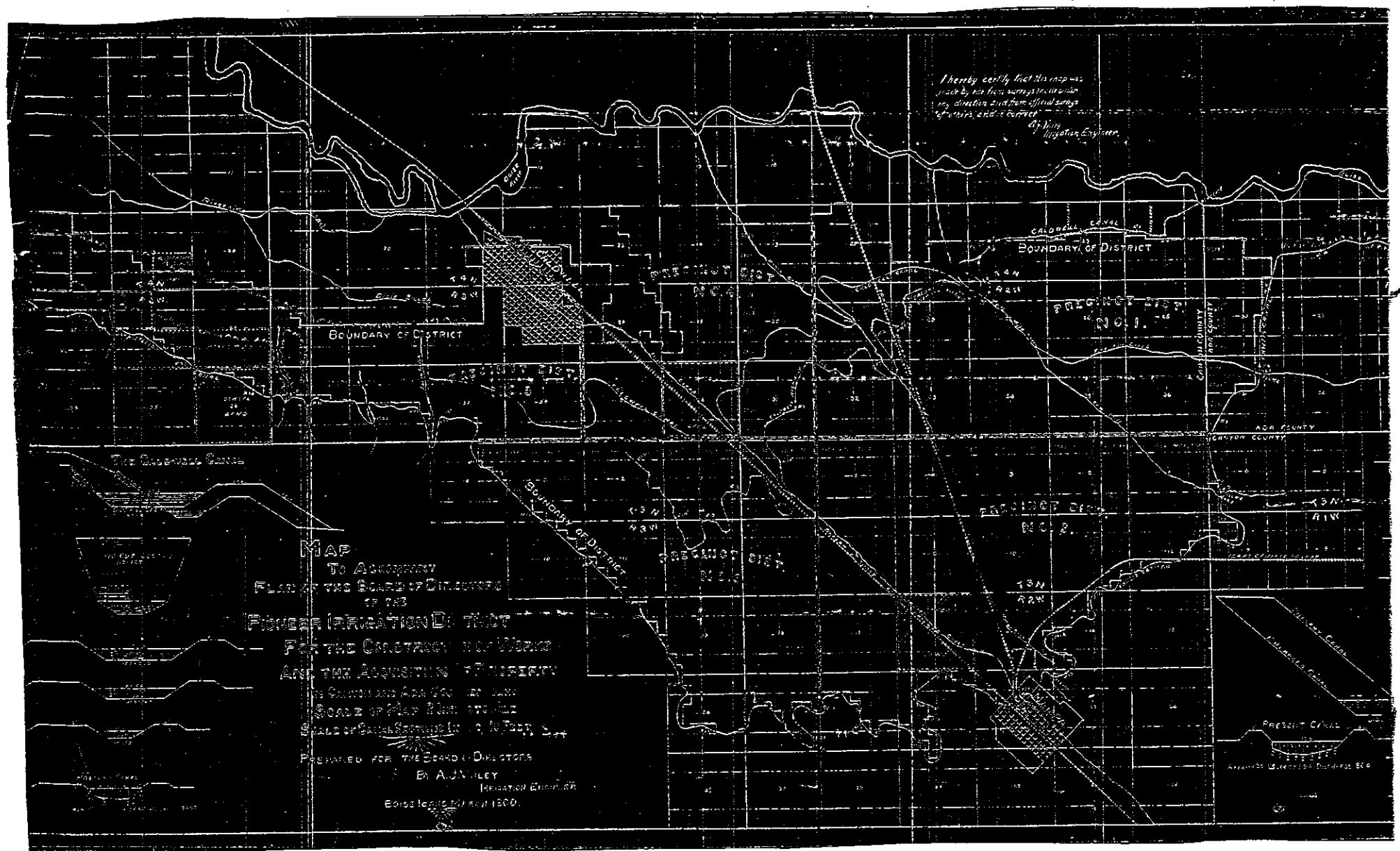

Dylan B. Lawrence

EXHIBIT A

To the Affidavit of Jennifer Stevens, Ph.D.

In Re SRBA Case No. 39576

Subcase Nos. 63-00166A, 63-00166B, 63-00167A,
63-00167B, 63-00179A, 63-00179C, 63-32580



COPY

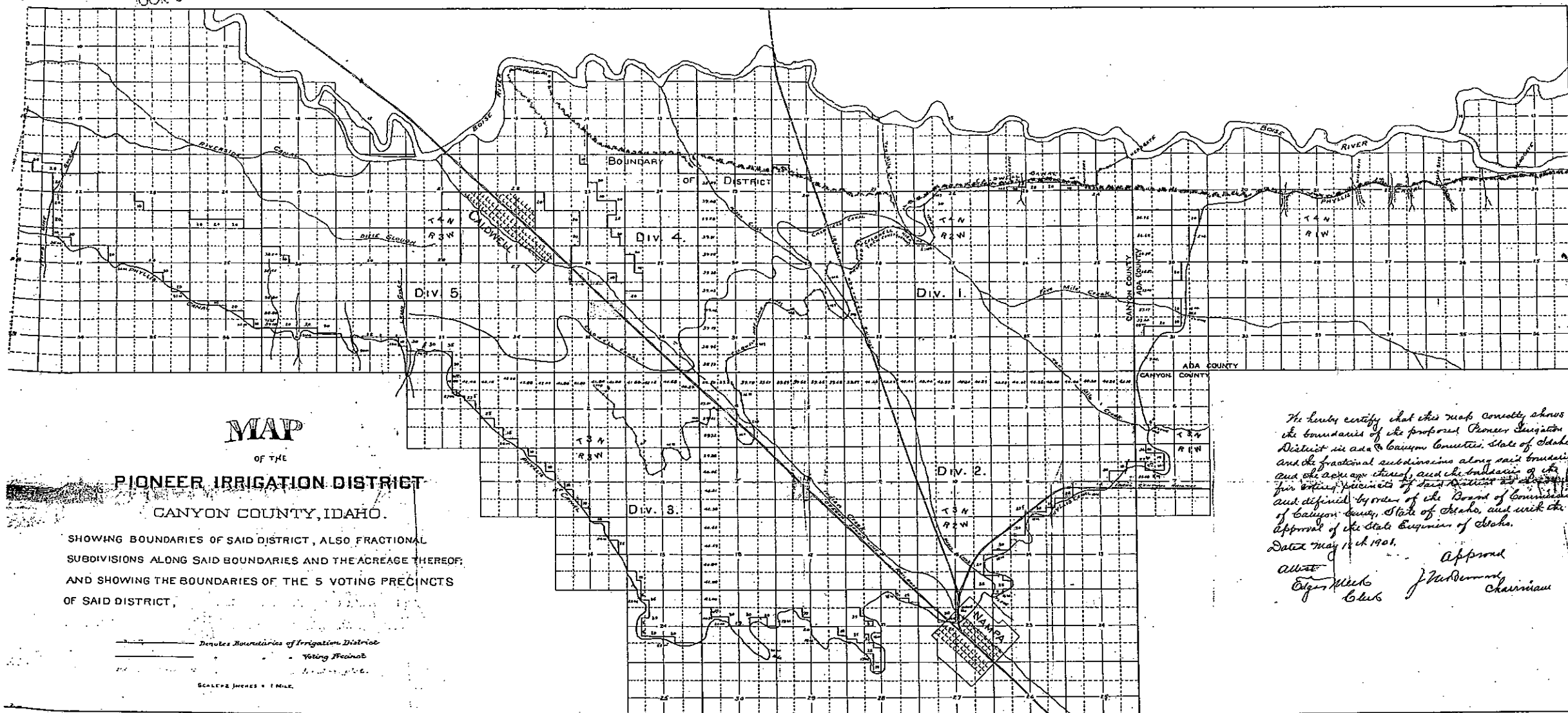
State Water Historical Society
Public Access and Research Library

EXHIBIT B

To the Affidavit of Jennifer Stevens, Ph.D.

In Re SRBA Case No. 39576

Subcase Nos. 63-00166A, 63-00166B, 63-00167A,
63-00167B, 63-00179A, 63-00179C, 63-32580



This hereby certify that this map correctly shows the boundaries of the proposed Pioneer Irrigation District in Ada & Canyon Counties, State of Idaho, and the fractional subdivisions along said boundaries and the acreage thereof, and the boundaries of the five voting precincts of said district as defined by order of the Board of Commissioners of Canyon County, State of Idaho, and with the approval of the State Engineer of Idaho.

Dated May 11th 1901.

Attest
Edgar M. Clark
Clerk

Approved
J. H. McDermott
Chairman