

(2) Attached hereto as Exhibit A is a true and correct copy of The Terteling Company, Inc.'s Answers to the Edwards Family, LLC's First Set of Interrogatories and Requests for Production in SRBA Subcase Nos. 63-12, 63-13, 63-15, 63-308, 63-3603, 63-7595, 63-31051, 63-31058, 63-31059, 63-31060 and 63-31062. On Page 5 of these Answers, Mr. Ed Squires is identified as a hydrogeologist retained by The Terteling Company for many years to assist "in investigating various physical attributes of its own water rights, and other parties' water rights. He is aware of the physical attributes surrounding the diversions of water rights claimed by TTCI [The Terteling Company, Inc.] and surrounding the use of the same." On page 8 of these Answers, in response to Interrogatory No. 3, The Terteling Company, Inc. states, "Ed Squires may be called as a rebuttal expert depending upon the type of expert evidence that Edwards Family, LLC puts on in these subcases."

(3) Attached hereto as Exhibit B is a true and correct copy of the deposition transcript for the limited deposition of Ed Squires taken in the above-captioned Subcases. The said deposition was limited to the professional experience of Mr. Squires because of The Terteling Company counsel's representations on the record at the deposition that Mr. Squires would only be used as a rebuttal expert witness and had not been asked to provide any opinions in the subject proceedings.

FURTHER YOUR AFFLIANT SAYETH NOT.

DATED this 22nd day of September, 2010.


Dana L. Hofstetter

SUBSCRIBED AND SWORN to before me this 22nd day of September, 2010.




Notary Public in and for the State of Idaho
Residing at: BOISE, IDAHO
My Commission Expires: 7/18/2014

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd day of September, 2010, I caused to be served a true copy of the foregoing (with any attachments) by the method(s) indicated below, and addressed to each of the following:

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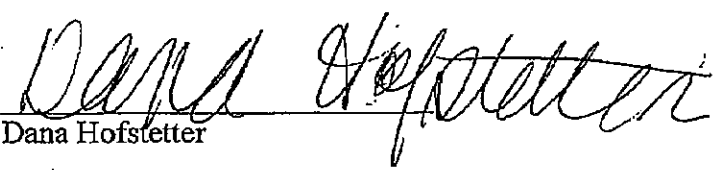
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Attorneys for Claimant The Terteling Company, Inc.

**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. 63-00012, 63-00013,
) 63-00015, 63-00308, 63-03603, 63-07595,
) 63-31051, 63-31058, 63-31059, 63-31060,
) and 63-31062
)
) THE TERTELING COMPANY, INC.'S
) ANSWERS TO EDWARDS FAMILY,
) LLC'S FIRST SET OF
) INTERROGATORIES AND REQUESTS
) FOR PRODUCTION
)

Claimant, The Terteling Company, Inc. (hereinafter "TTCF") hereby responds to discovery by submitting these Answers to Edwards Family, LLC's First Set of Interrogatories and Request for Production pursuant to Rules 26 and 33 of the Idaho Rules of Civil Procedure.

GENERAL OBJECTIONS

1. Claimant has not completed its own investigations and/or discovery. Accordingly, the answers that follow are based upon the best knowledge, information and beliefs of Claimant at this time. Claimant reserves the right to make any further answers if it appears that any omission

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or error has been made in connection with these answers or that more accurate information is or has become available. These answers are made without prejudice to Claimant's right to use in later discovery or to present at trial, such evidence as may later be discovered or evaluated.

2. Claimant objects to the definitions and instructions to the extent that they purport to require discovery answers beyond that required under the Idaho Rules of Civil Procedure. These answers are provided in accordance with the Idaho Rules of Civil Procedure irrespective of any definitions and instructions that may accompany these interrogatories.

3. These answers are made subject to all objections as to competence, relevance, materiality, and admissibility. These answers are subject to all objections that would require the exclusion of any statement, material, or information herein provided if such request were asked of or any statement, material, or information provided were made by witnesses present and testifying at the formal hearing or trial on this matter. All such objections are reserved and may be interposed at the time of the hearing or trial on this matter.

4. Claimant specifically objects to these discovery requests to the extent that they seek information protected by the attorney-client privilege, the attorney work product doctrine, and the rules governing the discovery of facts of experts as set forth in Rule 26(b)(4), Idaho Rules of Civil Procedure. This objection is intended to apply to all of the discovery requests that seek such information and will not be repeated specifically for each interrogatory to which it applies. Claimant has, to the extent possible, construed each interrogatory as requesting only information and/or documents not subject to any applicable protection.

5. No incidental or implied admissions are intended. The fact that Claimant has

responded to any discovery request or part thereof should not be taken as an admission that Claimant accepts that the discovery request or the response or objection thereto constitutes admissible evidence. Similarly, the fact that Claimant has responded to all or part of a request is not intended to and shall not be construed to be a waiver by Claimant of all or part of any objection to other requests. Claimant's answers to any discovery requests herein do not constitute a waiver of Claimant's right to object to any future additional or supplemental requests regarding the same or similar matters.

INTERROGATORY NO. 1: Please set forth the name, address, telephone number, and occupation of each and every individual known to you or your counsel who has knowledge of or who purports to have knowledge relating to any or all of your Claims (whether in support or in contradiction thereof), relating to any or all of the SRBA Director's Report Recommendations for your Claims, relating to any or all Objections filed in the SRBA Director's Report Recommendations for your Claims, or relating to any or all Responses filed to any filed Objections for your Claims, and set forth a full and accurate summary of the knowledge possessed by each such person.

ANSWER TO INTERROGATORY NO. 1: Objection. The interrogatory is compound, overbroad, burdensome, ambiguous and vague, and at least some of the information requested is in the possession of and/or equally available to Edwards Family, LLC. Notwithstanding its objections and without waiving the same, TTCI responds as follows:

1. J.L. Terteling
The Terteling Company, Inc.
3858 Garden Center Way, Suite 300
Boise, ID 83703
(208)229-4491

Mr. Terteling is a principal in TTCI. He is aware of facts and circumstances surrounding the filing of TTCI's claims in the SRBA, and of the filing of objections by TTCI to its claims in the SRBA. He is aware of facts and circumstances surrounding the use of each water right claimed by TTCI in the SRBA, and is aware of the facts and circumstances surrounding the basis for objections filed by TTCI to other water rights in the SRBA.

2. A.J. Terteling
The Terteling Company, Inc.
3858 Garden Center Way, Suite 300
Boise, ID 83703
(208)229-4491

Mr. Terteling is a principal in TTCI. He is aware of facts and circumstances surrounding at least some of TTCI's objections to its claims in the SRBA. He is aware of facts and circumstances surrounding the use by TTCI of at least some of its water rights that are claimed in the SRBA and is aware of the facts and circumstances surrounding the basis for at least some of the objections filed by TTCI to other water rights in the SRBA.

3. T.E. Terteling
The Terteling Company, Inc.
3858 Garden Center Way, Suite 300
Boise, ID 83703
(208)229-4491

Mr. Terteling is a principal in TTCI. He is aware of facts and circumstances surrounding at least some of TTCI's objections to its claims in the SRBA. He is aware of facts and circumstances surrounding the use by TTCI of at least some of its water rights that are claimed in the SRBA and is aware of the facts and circumstances surrounding the basis for at least some of the objections filed by TTCI to other water rights in the SRBA.

4. Vicky Music
IDWR Western Regional Offices
2735 Airport Way
Boise, ID 83705-5082
(208)334-2190

Ms. Music is an IDWR water right agent. She was involved in the preparation of the recommendations of many of TTCI's water rights and of water rights held by other parties in the area. She has also been involved with Water District 63-S.

5. **Jan Shurte**
IDWR Western Regional Offices
2735 Airport Way
Boise, ID 83705-5082
(208)334-2190

Ms. Music is an IDWR water right agent. She was involved in the preparation of the recommendations of many of TTCI's water rights and of water rights held by other parties in the area. She has also been involved with Water District 63-S.

6. **Garnette Edwards**
4106 Sand Creek Street
Boise, Idaho 83703

Ms. Edwards is a principal in Edwards Family, LLC. She is aware of facts and circumstances surrounding Edwards Family, LLC's objections to TTCI water rights.

7. **Norm Young**
ERO Resources
3314 Grace Street
Boise, ID 83703

Mr. Young is listed as a witness in this matter by Edwards Family, LLC. The extent of his knowledge regarding this matter is currently unknown.

8. **Ed Squires**
Hydro Logic, Inc.
1002 W. Franklin
Boise, ID 83701
(208)342-8369

Mr. Squires is a hydrogeologist who has been retained by TTCI for many years to assist TTCI in investigating various physical attributes of its own water rights, and other parties' water rights. He is aware of the physical attributes surrounding the diversions of water rights claimed by TTCI, and surrounding the use of the same.

9. **Terry Scanlan**
SPF Water Engineering
300 E. Mallard Drive, Suite 350
Boise, ID 83706
(208)383-4140