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DEPARTMENT OF
WATER RESOURCES

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Attorneys for American Falls Reservoir District #2

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 No. **01-00006**

**AMERICAN FALLS RESERVOIR
DISTRICT NO. 2'S THIRD REQUESTS
FOR PRODUCTION OF DOCUMENTS
TO THE STATE OF IDAHO**

REQUEST FOR PRODUCTION

Request is hereby made by the undersigned pursuant to Rule 34 of the applicable Rules of Civil Procedure, that you produce each document and thing identified in your answers to the interrogatories, except any such document and thing attached to your answers to the interrogatories, in the manner following:

AMERICAN FALLS RESERVOIR DISTRICT NO. 2'S THRID REQUESTS FOR
PRODUCTION OF DOCUMENTS TO THE STATE OF IDAHO – Page 1

(1) either by copying such items for production and then mailing or delivering such copies to the undersigned so that such copies are received by the undersigned not less than five days before the date specified in subparagraph (2) hereof in which case the undersigned will forthwith reimburse you through your counsel for such copies at the rate of ten cents per page of such copies;

(2) or, (if at your option you elect not to produce the items for production in the manner specified in subparagraph (1) hereof) by producing such items for production and permitting the undersigned, or someone acting on behalf of the undersigned, to inspect by reading and examining the same and to copy and photograph the same at the time and place hereinafter designated.

TIME AND PLACE OF PRODUCTION

The production above requested shall take place at Capitol Law Group, PLLC.

Time: 10:00 o'clock, a.m.

Date: **November 22, 2011**

Place: **Idaho Water District 1 Office, 900 N. Skyline Dr., Ste. A
Idaho Falls, ID 83402**, or other such convenient place as agreed to by the parties.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 3: Please produce each and every document and/or other physical or tangible object in your possession that is related to the archived records listed in Attachment 1.

DATED this 14th day of November, 2011

CAPITOL LAW GROUP, PLLC



C. Tom Arkoosh
Attorney for American Falls Reservoir District #2

WD1-	PCA	Box #	Description
WD1-	63402	1	1997 Water Right Accounting Documents
WD1-	63402	2	1998 Water Right Accounting Documents
WD1-	63402	3	1992 Water Right Accounting Documents
WD1-	63403/63404	4	2002/2003 EAST & NORTH Measurement Cards
WD1-	63404	5	1997-2002 North Measurement Cards
WD1-	63403	6	1999-2001 East Measurement Cards
WD1-	7984	7	2002 Watermaster Books
WD1-	7984	8	2000 Preliminary and Final WR Accounting
WD1-	7984	9	2001 Preliminary and Final WR Accounting
WD1-	7984	10	2002 Preliminary and Final WR Accounting
WD1-	7984	11	2005 Preliminary and Final WR Accounting
WD1-	7984	12	PWUI Receipt Book & Payment History
WD1-	7984	13	2001 Watermaster Books
WD1-	7984	14	2001 & 200 Watermaster Books
WD1-	63402	15	1996 Water Right Accounting
WD1-	63402	16	Personnel Files
WD1-	63402	17	Slides
WD1-	63402	18	Slides
WD1-	63402	19	Salmon ESA/Coalition (Ron)
WD1-	63402	20	Canal Storage Records 1960-1977
WD1-	63402	21	Canal Storage Records 1930-1960
WD1-	63402	22	Correspondence USBR etc 1940-1960
WD1-	63402	23	2000/2001 Recorder Charts/Pumping Records
WD1-	63402	24	Old Computer Programs
WD1-	63402	25	95 Accounts Receivables/Bank Statements
WD1-	63402	26	97 Accounting Records
WD1-	63402	27	Rolodex's
WD1-	63402	28	97-98 Bank Statements/95 Billing/Data Storage Disks
WD1-	63402	29	93 Accounting Records
WD1-	63402	30	93-94 Accounts Payable Records
WD1-	63402	31	94 Correspondence
WD1-	63402	32	96 Accounting Records
WD1-	63402	33	77-91 Accounting Records

WD1-	63402	34	Misc. Records
WD1-	63402	35	Misc. Records
WD1-	63402	36	92 Accounts Payable Records/87-91 Misc. Contracts
WD1-	63402	37	Misc. Records
WD1-	63402	38	92-93 Correspondence
WD1-	63402	39	1998 Accounts Payable Records
WD1-	63402	40	1986 Records & Older
WD1-	63402	41	1978-1989
WD1-	63402	42	1978-1986 Black Books
WD1-	63402	43	1989-1992 Black Books
WD1-	63402	44	1993-1995 Black Books
WD1-	63402	45	1995-1997 Black Books
WD1-	63402	46	1986 & 1998 Black Books
WD1-	63402	47	Personnel Files/Annual Meeting/PWUI Stuff
WD1-	63402	48	1995 & 1996 Accounting Records
WD1-	63402	49	1995 Water Right Accounting Documents
WD1-	63402	50	1990 Water Right Accounting Documents
WD1-	63402	51	1991 Water Right Accounting Documents
WD1-	63402	52	1999 Water Right Accounting Documents
WD1-	63402	53	1994 Water Right Accounting Documents
WD1-	63402	54	1993 Water Right Accounting Documents
WD1-	63402	55	
WD1-	63402	56	
WD1-	63402	57	USGS Water Resource Data Books (1993-2002)
WD1-	63402	58	USGS Water Resource Data Books (1982-1992)
WD1-	63402	59	USGS Water Resource Data Books (1966-1981)
WD1-	63402	60	Water Law Seminar Resource Books
WD1-	63402	61	WATERMASTER REPORTS (MASTERS)(1987,1995, 1997, 1998, 2000) 1992 D's & P's
WD1-	63402	62	WATERMASTER REPORTS (MASTERS)(1988, 1990, 1994), 1996 REACH GAINS, 1994 ACCOUNTING
WD1-	63402	63	1997-2000 CORRESPONDENCE FILES
WD1-	63402	64	2001 FINANCIAL RECORDS
WD1-	63402	65	2001 BANK/CHECK RECORDS
WD1-	63402	66	2001-2002 CORRESPONDENCE FILES
WD1-	63402	67	2002 FINANCIAL RECORDS

WD1-	63402	68	1999 FINANCIAL RECORDS
WD1-	63402	69	1999 TETON COUNTY BILLING, 1998 & 99 WD AND RENTAL POOL JOURNAL ENTRIES, 1999 FINANCIAL REPORTS, 1999 ACCOUNTING REPORT, 1999 BANK/CHECK RECORDS
WD1-	63402	70	2000 A/P RECORDS, 2000 CHECK, BANK RECORDS, WD1 RECEIPT BOOK 7/28/99-10/13/00, RENTAL POOL RECEIPT BOOK 11/92-7/28/00
WD1-	63402	71	2003 FINANCIAL RECORDS (A/P FILES)
WD1-	63402	72	2003 FINANCIAL RECORDS (BANKING INFO AND WD01 CHECKS)
WD1-	63402	73	BONNEVILLE/JEFFERSON GWD FILES A-G
WD1-	63402	74	BONNEVILLE/JEFFERSON GWD FILES H-P
WD1-	63402	75	BONNEVILLE/JEFFERSON GWD FILES R-Z
WD1-	63402	76	PUMP CARDS (1998, 2003, 2004) WD1 GAGE BOOKS 1998-2001
WD1-	63402	77	WD1 MEASUREMENT NOTES 1983-1991
WD1-	63402	78	2003 Preliminary WR Accounting/ 2003 Ds & Ps
WD1-	63402	79	2004 Final WR Accounting/ 1986 WM Report (Master) / 1989 WM Report (Master)
WD1-	63402	80	1988/1990-1999/ 2001 Watermaster Reports (1 each)
WD1-	63402	81	Receipt Books
WD1-	63402	82	Watermaster Reports 1989-1993, 1999, 2000 (2), 2003 (2)
WD1-	63402	83	Watermaster Reports 2006 (9)
WD1-	63402	84	Watermaster Reports 1999 (4), 2000 (3), 2001 (1), 2002 (2)
WD1-	63402	85	Watermaster Report (Original) 2000 & 1995, 2003 Final WR Accounting, 2005 Ds & Ps
WD1-	63402	86	2007 Preliminary and Final Water Right Accounting
WD1-	63402	87	1979 and 1980 Water Right Accounting