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Department of Water Resources

Attorneys for Objector
Pioneer Irrigation District

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FIELDS, CHARTERED
101 S. Capitol Blvd., 10th Floor
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Boise, Idaho 83701
Telephone (208) 345-2000
Facsimile (208) 385-5384
18946.0137

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

Subcases No. 63-00179C, 63-32580

**NOTICE OF RULE 30(b)(6) DEPOSITION OF
THE MASON CREEK DITCH COMPANY**

PLEASE TAKE NOTICE that Objector Pioneer Irrigation District hereby notices, pursuant to Idaho Rule of Civil Procedure 30(b)(6) and Idaho Rule of Evidence 706(a), a deposition of the Mason Creek Ditch Company ("Mason Creek"), before an officer authorized to administer oaths on Thursday, December 15, 2011, at 9:30 a.m., and continuing thereafter from day to day until completed, at the offices of MOFFATT, THOMAS, BARRETT, ROCK & FIELDS, CHARTERED, located at 101 S. Capitol Blvd., 10th Floor, Boise, Idaho, at which time and place you are notified to appear and take such part in the examination as you may deem proper.

**NOTICE OF RULE 30(b)(6) DEPOSITION OF THE
MASON CREEK DITCH COMPANY - 1**

Client:2256721.1

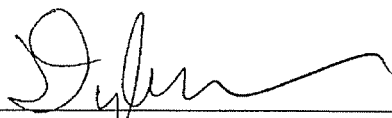
Pursuant to Idaho Rule of Civil Procedure 30(b)(6), Mason Creek has a duty to designate one or more knowledgeable representatives to testify on its behalf at this deposition. Specifically, examination is requested to include, without limitation, the following topics:

1. The bases of the SRBA water right claims that Mason Creek filed;
2. Mason Creek's organizational attributes, including discussion of issues such as officers, directors, shareholders, records, *etc.*;
3. Mason Creek's historical and current water conveyance and distribution system, *i.e.*, where and how water is diverted and conveyed, and to whom; and
4. Mason Creek's historical and current water needs and usage.

This deposition shall take place pursuant to the Idaho Rules of Civil Procedure.

DATED this 5 day of December, 2011.

MOFFATT, THOMAS, BARRETT, ROCK &
FIELDS, CHARTERED

By 
Dylan B. Lawrence – Of the Firm
Attorneys for Objector
Pioneer Irrigation District

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5 day of December, 2011, I caused a true and correct copy of the foregoing **NOTICE OF RULE 30(b)(6) DEPOSITION OF THE MASON CREEK DITCH COMPANY** to be served by the method indicated below, and addressed to the following:

Director
IDAHO DEPARTMENT OF WATER RESOURCES
P.O. Box 83720
Boise, ID 83720-0098

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

Mason Creek Ditch Co.
Represented by:
Albert P. Barker
1010 W. Jefferson, Ste. 102
P.O. Box 2139
Boise, ID 83701-2139

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

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

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

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Jeana Reiner
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776 East Riverside Drive, Suite 200
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☒ (X) Email



Dylan B. Lawrence

Attorneys for Objector
Pioneer Irrigation District

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**NOTICE OF SERVICE FOR RULE 30(b)(6)
DEPOSITION OF THE MASON CREEK DITCH
COMPANY**

I HEREBY CERTIFY that on this 5th day of December, 2011, I caused a true
and correct copy of the **NOTICE OF RULE 30(b)(6) DEPOSITION OF THE MASON CREEK DITCH
COMPANY** and the foregoing **NOTICE OF SERVICE** to be served by the method indicated below,
and addressed to the following:

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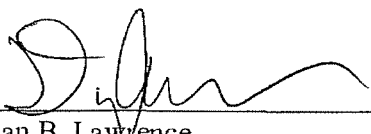
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