

Movant's Name:
UNITED STATES OF AMERICA

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Attorneys' Names and Addresses:

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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	)	Sub-case No.:	36-15450
	)		36-00030
	)		36-00104A
CASE NO. 39576	)		36-00104B
	)		36-00043A
	)		36-00084
	)		36-00012
	)		
	)	REQUEST FOR PRODUCTION	
	)	OF DOCUMENTS AND	
	)	INTERROGATORIES	
	)		
	)		

To: FLYING TRIANGLE, INC., WILLIAM BRAILSFORD, FRED L. MAVENCAMP,
RONNIE D. SMITH, SHARLENE SMITH, NEVADA OMOHUNDRO, JOAN WISE,
AND SHELBY WISE

YOU WILL PLEASE TAKE NOTICE that the movants require you to answer under oath the following interrogatories and respond to the requests for production of documents within fifteen (15) days from the service hereunder, and in conformance with all provisions of Rules 33 and 34 of the Idaho Rules of Civil Procedure.

In answering these interrogatories and responding to these requests for production of documents, furnish all information
1 - REQUEST FOR PRODUCTION OF DOCUMENTS AND INTERROGATORIES

available to you, including information in the possession of your attorneys and investigators, experts, and consultants retained by you or your attorneys, and not merely information of your own personal knowledge.

If you cannot answer the following interrogatories or respond to the following requests for production of documents in full, after exercising due diligence to secure the information to do so, so state, and answer to the extent possible, specifying your inability to answer the remainder, and stating whatever information and knowledge you have concerning the unanswered portion.

These interrogatories and requests for production of documents are deemed continuing interrogatories and requests for production of documents, and your answers thereto are to be supplemented as additional information becomes available or known to you.

INTERROGATORY NO. 1: Please identify, for each year you have owned or occupied lands irrigated with water from Len Lewis Spring, all information pertaining to the matters referred to below:

- A. Total number of acres irrigated each year;
- B. Number of acres irrigated with water from Len Lewis Spring each year;
- C. Varieties of crops grown each year;
- D. Number of acres of each crop grown each year;
- E. Method of irrigation, i.e., furrow, flood, or sprinkler each year;
- F. Set time for each irrigation run each year;
- G. Time period between irrigations during peak use

period each year;

H. Soil types, textures, slopes and depths being irrigated each year;

I. Seepage losses in Brailsford Ditch and laterals;

REQUEST FOR PRODUCTION NO. 1: Produce all documents of any type which refer to the matters in the above interrogatory.

INTERROGATORY NO. 2: Please identify, for each year you have owned or occupied lands irrigated with water from Len Lewis Spring, the following information:

A. The date you first called for and received water from Len Lewis Spring each calendar year;

B. The date you fully utilized your entire decreed entitlement to water from Len Lewis Spring each year, if you did;

C. To the extent that you fully utilized your entire decreed entitlement from Len Lewis Spring in a given year, the purposes of such utilization, and the time of such utilization;

C. To the extent that you did not fully utilize your decreed entitlement from Len Lewis Spring in a given year, the amount of water which you actually utilized that year, the purposes of such utilization, and time of such utilization;

REQUEST FOR PRODUCTION NO. 2: Produce all documents of any type which pertain to the matters referred to in Interrogatory No. 2.

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