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FEB 14 2014

DEPARTMENT OF
WATER RESOURCES

**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: 01-10614, 01-10615,
01-10616, 01-10617,
01-10618, 01-10620,
01-10621, 01-10622,
01-10623**

**CLAIMANTS' SUBPOENA DUCES
TECUM AND SUBPOENA FOR ORAL
DEPOSITION OF IDAHO
DEPARTMENT OF WATER
RESOURCES PURSUANT TO I.R.C.P.
30(b)(6) AND I.R.C.P. 45(b)(2)**

TO: IDAHO DEPARTMENT OF WATER RESOURCES

YOU ARE COMMANDED:

To produce or permit inspection and copying of the following documents or objects, including electronically stored information, **no later than 30 days from the date of service of this subpoena**, at the offices of Barker Rosholt & Simpson LLP, 1010 W. Jefferson St., Suite 102, Boise, Idaho 83701. Alternatively, you may mail the documents, no later than 30 days from

the date of service of this subpoena, to John K. Simpson, Barker Rosholt & Simpson LLP, 1010 W. Jefferson St., Suite 102, Boise, Idaho 83701.

The following documents must be produced:

1. All records and documents relied upon and related to the investigation and preparation of the Director's Reports for the above-referenced water right claims.
2. All records and documents related to the investigation and preparation of any Director's Reports for storage water right claims in the SRBA based upon a constitutional or beneficial use basis of claim.
3. All records and documents related to the accounting and administration of storage water rights in Basin 01.
4. All records and documents quantifying the flow of water through the following reservoirs in Basin 01, Lake Walcott, American Falls Reservoir, Palisades Reservoir and Jackson Lake prior to 1971.
5. All correspondence and communications between any Department personnel or counsel with any other persons, including their agents and/or counsel, concerning the above-referenced water right claims.
6. All correspondence and communications between any Department personnel or counsel with the Idaho Attorney General's Office representing the State of Idaho in the Snake River Basin Adjudication, including their agents and/or counsel, concerning the above-referenced water right claims.
7. All correspondence and communications between any Department personnel or counsel with any other persons, including their agents and/or counsel, concerning any other Basin 01 storage water right claims.

YOU ARE FURTHER COMMANDED:

To appear at the place, date and time specified below to testify in the above-captioned case. You should designate one or more officers, directors, staff, managing agents, or other persons who consent to testify on your behalf, who can testify on behalf of your agency as to the following matters known or reasonably available to your agency:

1. The documents referenced above;
2. The Director's Reports issued for the above-referenced water right claims and the investigation, research, field work, and any other activity taken by your agency to prepare such Director's Reports;

3. All records and documents related to the investigation and preparation of any Director's Reports for storage water right claims in the SRBA based upon a constitutional or beneficial use basis of claim.

PLACE, DATE, AND TIME: Barker Rosholt & Simpson LLP, 1010 W. Jefferson St., Suite 102, Boise, Idaho 83701 on March 18, 2014 at 9:00 a.m.

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above, that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED this 12th day of February, 2014.

BARKER ROSHOLT & SIMPSON LLP



John K. Simpson
Travis L. Thompson
Paul L. Arrington

*Attorneys for A&B Irrigation District, Burley
Irrigation District, Milner Irrigation District,
North Side Canal Company, and Twin Falls
Canal Company*

FLETCHER LAW OFFICE



*Attorneys for American Falls
Reservoir District #2 and Minidoka
Irrigation District*

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of February, 2014, I served a true and correct copy of the foregoing document(s) on the person(s) listed below, in the manner indicated:

By U.S. Mail and email:

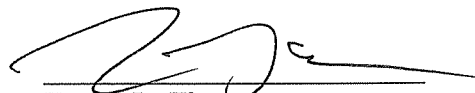
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By U.S. Mail:

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United States Department of Justice
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Boise, Idaho 83724


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