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DEPARTMENT OF
WATER RESOURCES

Claimants served their initial *Claimants Steve and Deanne Hawks' Responses to Objector's First Requests for Discovery* on March 7, 2016. On March 28, 2016 *Claimants Steve and Deanne Hawks' Amended Responses to Objector's First Requests for Discovery* were received.

The Tribe asserts that Claimants' objections, answers, and response to be unfounded or otherwise inadequate. This motion is supported by a memorandum of law and affidavit of counsel, filed concurrently with this motion, and are by reference, incorporated herein.

The undersigned hereby certifies in compliance with Rule 37(a)(2) that movant has in good faith conferred or attempted to confer with counsel for the Claimants in an effort to secure the disclosure without court action and that resolution of the matter has not occurred.

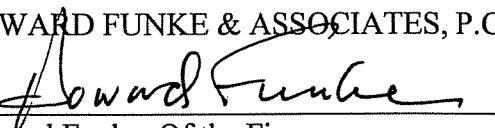
The Tribe therefore requests the Court set a hearing on this motion, to rule upon Claimants' objections to the Tribe's interrogatories and a request for production of documents, and to compel Claimants to fully and fairly answer said interrogatories and respond to the request for production of documents.

Pursuant to I.R.C.P. 37(a)(4), the Tribe seeks its reasonable expenses incurred in obtaining any such order, including attorney's fees.

THE TRIBE REQUESTS AND RESERVES ORAL ARGUMENT ON THIS MOTION.

Respectfully submitted this 15th day of April, 2016.

HOWARD FUNKE & ASSOCIATES, P.C.

By: 

Howard Funke, Of the Firm

Attorneys for the Coeur d'Alene Tribe

Certificate of Service

I hereby certify that on the 16th day of April, 2016, a copy of the foregoing Motion to Compel was served on the following counsel of record and other entities via the method indicated below:

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Idaho Department of Water Resources

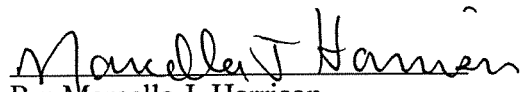
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By: Marcella J. Harrison