

Werner, Linda

RECEIVED

AUG 09 2016

IDWR / NORTH

From: Linda Jones [LJones@hollandhart.com]
Sent: Tuesday, August 09, 2016 2:00 PM
To: Werner, Linda
Cc: jcustis@shomed.org
Subject: Second Amended Claim
Attachments: Organization of Hospital District.pdf; Court Order LONG form.pdf; Second Amended Claim for Water Right.pdf

Linda W. – I attach a form of Second Amended Claim for the Shoshone Medical Center. I believe this covers all of the changes we have discussed, including in the phone conference last Friday with Justin Custis. I also attach a document showing the date the Shoshone Hospital District was formed (in 1954) and a Condemnation Order dated Sept 10, 1956, affirming the condemnation (against the School District) of an interest in the reservoir, water pipeline and pipeline and road easements in favor of the Hospital, providing the basis for the water right priority date. Please confirm that these additional documents complete the evidence needed for the Medical Center's claim for water right 94-8407, for industrial and irrigation purposes and the Sept. 10, 1956 priority date.

Also, please confirm whether sending this additional information to you is all that is required to move us to an SF5 modification, or whether we need to file these documents and copies of all of the other evidence (photos, affidavits) we have provided to you with the Court in a Supplemental Objection. With your confirmation, I will have the Second Amended Claim signed and will send it in. Thanks you. Linda J.

Linda B. Jones
Partner
Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702
Phone (208) 342-5000; (208) 383-3931 (direct)
Fax (800) 565-7694
E-mail: ljones@hollandhart.com



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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 THE GENERAL ADJUDICATION OF RIGHTS TO
THE USE OF WATER FROM THE COEUR D'ALENE-
SPOKANE RIVER BASIN WATER SYSTEM

CIVIL CASE NUMBER: 49578

Ident. Number: 84-8407

Date Received:

Receipt No:

Received By:

SECOND AMENDED
NOTICE OF CLAIM TO A WATER RIGHT ACQUIRED
UNDER STATE LAW

1. Name of Claimant(s)

WEST SHOSHONE HOSPITAL Phone (208) 784-1221
DISTRICT #1
28 JACOBS GULCH RD
KELLOGG ID 83837

2. Date of Priority: 2/14/1956

3. Source: JACKASS CREEK

Tributary to: SOUTH FORK COEUR D ALENE RIVER

4. Point of Diversion:

Township	Range	Section	1/4 of 1/4 of 1/4	Lot	County	Type
49N	03E	30	SW SE	8	SHOSHONE	

5. Description of diverting works.

6. Water is used for the following purposes:

Purpose	From To	C.F.S.	(or) A.F.A.
INDUSTRIAL	01/01 12/31	0.075	
INDUSTRIAL FROM STORAGE	01/01 12/31	0.075	
INDUSTRIAL STORAGE	01/01 12/31		1
IRRIGATION	04/01 10/31	0.075	
IRRIGATION FROM STORAGE	04/01 10/31	0.075	
IRRIGATION STORAGE	04/01 10/31		1

7. Total Quantity Appropriated is: 0.15 C.F.S. and/or 1 A.F.A.

8. Non-irrigation uses:

9. Place of use:

Township	Range	Section	1/4 of 1/4		Lot	Use	Acres
49N	03E	30	SW	SE	6	IRRIGATION STORAGE	

Section Acres

Township	Range	Section	1/4 of 1/4		Lot	Use	Acres
49N	03E	30	SW	SE	6	INDUSTRIAL STORAGE	

Section Acres

Township	Range	Section	1/4 of 1/4		Lot	Use	Acres
49N	03E	31	NE	SW		IRRIGATION FROM STORAGE	0.5
			SW	SW	4	IRRIGATION FROM STORAGE	0.5
			SE	SW	5	IRRIGATION FROM STORAGE	1.5

Section Acres

2.5

Township	Range	Section	1/4 of 1/4		Lot	Use	Acres
49N	03E	31	NE	SW		IRRIGATION	0.5
			SW	SW	4	IRRIGATION	0.5
			SE	SW	5	IRRIGATION	1.5

Section Acres

2.5

Township	Range	Section	1/4 of 1/4		Lot	Use	Acres
49N	03E	31	NE	SW		INDUSTRIAL FROM STORAGE	

Section Acres

Township	Range	Section	1/4 of 1/4		Lot	Use	Acres
49N	03E	31	NE	SW		INDUSTRIAL	

Section Acres

Total Acres 2.5

10. Place of use in counties: SHOSHONE
11. Do you own the property listed above as place of use? Yes
12. Other Water Rights Used:
13. Remarks:

Priority date description:

The date of Order No. 12548, District Court of the First Judicial District of the State of Idaho, in and for the County of Shoshone

Description of use: Water Use

Decontolion

INDUSTRIAL

Includes water for decontamination unit, non-potable water for facilities, and non-potable water for emergency use (inside and outside the hospital)

INDUSTRIAL FROM STORAGE

INDUSTRIAL STORAGE

IRRIGATION

IRRIGATION FROM STORAGE

IRRIGATION STORAGE

14. Basis of Claim: Beneficial Use

15. Signature(s)

(a.) By signing below, I/We acknowledge that I/We have received, read and understand the form entitled "How you will receive notice in the Coeur d'Alene-Spokane River Basin Adjudication." (b.) I/We do _____ do not _____ wish to receive and pay a small annual fee for monthly copies of the docket sheet.

For Individuals: I/We do solemnly swear or affirm under penalty or perjury that the statements contained in the foregoing document are true and correct.

Signature of Claimant(s): _____ Date: _____
_____ Date: _____

For Organizations: I do solemnly swear or affirm under penalty or perjury that I am

_____ of _____
Title Organization

That I have signed the foregoing document in the space below as

_____ of _____
Title Organization

and that the statements contained in the foregoing document are true and correct.

Signature of Authorized Agent _____ Date: _____

Title and Organization _____
Please print name

BEFORE THE BOARD OF COUNTY COMMISSIONERS OF THE
COUNTY OF SHOSHONE, STATE OF IDAHO

RECEIVED

AUG 09 2016

In the Matter of the application for
the Organization of the West Shoshone
Hospital District

ORDER ESTABLISHING WEST
SHOSHONE HOSPITAL DISTRICT IDWR / NORTH

The Board of County Commissioners of Shoshone County, Idaho, having met in regular session on Tuesday the 7th day of September, 1954, at which time the Clerk of said Board of Commissioners presented to the Board the certification by the Judges of Election of the official results of the election held on the 31st day of August, 1954, under the provisions of Title 39, Chapter 13, Idaho Code, at which election the voters within the proposed boundaries of the West Shoshone Hospital District voted upon the question as to whether or not West Shoshone Hospital District should be organized within Shoshone County, Idaho. The Board of County Commissioners then proceeded to canvass the votes cast at such election and upon such canvass it was found that of the duly qualified voters actually voting in said election, a total of 1108 votes were cast in favor of the organization of such district, and a total of 123 votes were cast against the organization of such district.

It appearing to the said Board of Commissioners that more than one-half (1/2) of the votes cast by the qualified voters residing within the proposed West Shoshone County Hospital District were in favor of the organization of such hospital district and that pursuant to the provisions of Title 39, Chapter 13, Idaho Code, it is within the jurisdiction of the Board of County Commissioners to organize such district and is, in fact, required that such district be duly organized pursuant to law.

NOW, THEREFORE, IT IS HEREBY ORDERED that the territory contained within the following described boundaries which are hereby established, to-wit:

Commencing at the intersection of the westerly boundary line of Shoshone County and the South boundary line of Township Forty-seven (47) North, Range One (1) East, Boise Meridian; thence in an Easterly direction along the boundary line between Townships Forty-six (46) and Forty-seven (47) North, to the Southwest Corner of Section Thirty-five (35) Township Forty-seven (47) North, Range Three (3) East, Boise Meridian; thence in a Northerly direction along the section lines to the Northwest Corner of Section Two (2), Township Fifty-two (52) North, Range Three (3) East, Boise Meridian; thence in an Easterly direction on the Township line between Townships Fifty-two (52) North, and Fifty-three (53) North, to the Eastern boundary of Shoshone County, State of Idaho; thence in a Northwesterly direction along the Northerly and Easterly boundary of Shoshone County to the Westerly boundary of Shoshone County; thence in a Southerly direction along the Westerly boundary of Shoshone County, Idaho, to the place of beginning.

be, and the same is hereby duly declared to be organized as a hospital district under the name of "WEST SHOSHONE HOSPITAL DISTRICT".

IT IS FURTHER ORDERED that the Clerk of the Board of County Commissioners of Shoshone County, Idaho, certify a copy of this order to immediately be filed for record in the office of the County Recorder of Shoshone County, Idaho, and to transmit a copy, duly certified by such Clerk, to the Governor of the State of Idaho.

Dated at Wallace, Idaho, this 7th day of September, 1954.

BOARD OF COUNTY COMMISSIONERS
OF SHOSHONE COUNTY, IDAHO

C. M. Shiplett
Chairman

Vincent Alexander

Ray C Dunkle

ATTEST:

Anna K Battick
Clerk

RECORDED at the request of Shoshone County September 13, 1954 at 9:20 o'clock A. M.

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Sec
A
The
This

Book 91, Page 370, case No. 12548

legal description of property

(Shoshone County - Idaho)

AUG 09 2016

IDWR / NORTH

INSTRUMENT NUMBER 160831

IN THE DISTRICT COURT OF THE FIRST JUDICIAL DISTRICT OF THE STATE
OF IDAHO, IN AND FOR THE COUNTY OF SHOSHONEWEST SHOSHONE HOSPITAL DISTRICT
NO. 1, a municipal corporation
of the State of Idaho,

Plaintiff

Vs.

JOINT CLASS "A" SCHOOL DISTRICT
NO. 391, Shoshone and Kootenai
Counties, State of Idaho,

Defendant

No. 12548

FINAL ORDER OF CONDEMNATION
AND DECREE

This matter having come regularly on for hearing before the above entitled Court this 10th day of September, 1956, on motion of the Plaintiff in the above entitled matter, the Plaintiff appearing by James G. Towles, its attorney, and the Defendant appearing by John J. Peacock, of the firm of Brown and Peacock, its attorneys,

It appearing to this Court, and the Court now finds that on the 14th day of February, 1956, this Court made and gave its preliminary Order of Condemnation in the above entitled proceeding wherein and whereby it was found and determined that the allegations of Plaintiff's Amended Complaint, as amended, are true, and that the Plaintiff was engaged in a public use, and that the taking of the property hereinafter described, and as described in Plaintiff's Amended Complaint, as amended, including the water facilities therein, was necessary to such public use, and that the use to which Plaintiff intended to apply said property and its interest in the water system hereinafter described for the purposes of a general public hospital was a more necessary public use than that to which the property was presently being applied by the Defendant School District,

And it further appearing to the Court, and the Court now finds, that, subsequent to the entry of such preliminary Order of Condemnation, and on the 3rd day of July, 1956, on petition of the Plaintiff, and under the provisions of Idaho Code, Section 7-717, this Court appointed Commissioners to appraise the damages occasioned to the Defendant, and said Appraisers and Commissioners thereafter duly filed their Report to the Court assessing and appraising the damages occasioned to the Defendant for such taking, and, within thirty (30) days thereafter, the Plaintiff has deposited with the Clerk of this Court the sum of money so found by said Commissioners, to-wit, the amount of \$28257.98.

And it further appearing to this Court, the Court so finds and decides, that Defendant has elected to accept the findings of said Commissioners as to the damages occasioned to it for such taking, and has accepted and received payment for such damages from the Clerk of this Court on the 10th day of September, 1956.

And it further appearing to the Court, and the Court so finds and decides, that said Plaintiff has made all payments that are required by law or by the Order or Orders of this Court, and that this is not a case where any bond for the building of fences, cattle guards, or other protective structures is necessary or need be given, and all and singular the laws and the premises being by the Court understood and fully considered.

IT IS, THEREFORE, ORDERED, ADJUDGED, AND DECREED, That the parcel of land and water rights hereinafter described, as follows, to-wit:

Being a tract of land lying in the Southwest Quarter (SW $\frac{1}{4}$) of Section Thirty-one (31), Township Forty-nine (49) North, Range Three (3) East of the Boise Meridian, and being more particularly described as follows:

Beginning at Corner No. 1, from whence the South Quarter Section Corner of said Section bears S 0° 05' E, 601.00 ft. distant; thence N 76° 38' W, 1119.42 ft. distant, to Corner No. 2; thence S 34° 39' W, 84.12 ft. distant, to Corner No. 3; thence N 54° 58' W, 400.00 ft. distant, to Corner No. 4; thence N 29° 42' E, 818.00 ft. distant, to Corner No. 5; thence S 70° 22' E, 1123.36 ft. distant, to Corner No. 6; thence S 0° 05' E, 722.29 ft. distant, to Corner No. 1, the place of beginning.

Excepting therefrom an easement for sidewalk purposes ten feet (10') in width along the old ditch line on the west slope of the hill on the East side of Jacob's Gulch extending to Riverside Avenue as projected.

A. An undivided one-half interest in and to the water flowing in Jacob's Gulch and collected in the impounding reservoir and impounding area described as follows, together with the impounding facilities situated therein:

Being a tract of land lying in the Southeast Quarter (SE $\frac{1}{4}$) of Section Thirty (30), Township Forty-nine (49) North, Range Three (3) East of the Boise Meridian, and being more particularly described as follows:

Beginning at a point on line between Corner No. 1 and Corner No. 4, from whence the South Quarter Corner of said Section bears S 30° 31' W, 1360.00 ft. distant; thence N 59° 29' W, 40.00 ft. distant to Corner No. 1; thence N 40° E, 170.00 ft. distant to Corner No. 2; thence S 59° 29' E, 130.00 ft. distant to Corner No. 3; thence N 59° 29' W, 90.00 ft. distant to the point first described above, and 130.00 ft. distant to Corner No. 1.

An undivided one-half interest in the Easement from the Bunker Hill and Sullivan Mining and Concentrating Company to Defendant, as follows:

B. Easement from Bunker Hill and Sullivan Mining and Concentrating

Being an easement for a water pipe line and servicing access road across the following described tract of land lying in the Southeast Quarter (SE $\frac{1}{4}$) of Section Thirty (30), Township Forty-nine (49) North, Range Three (3) East of the Boise Meridian: Beginning at Corner No. 1, identical with the South Quarter Section Corner of said Section Thirty (30); thence N 30° 31' E, 1360.00 ft. distant, to Corner No. 2; thence S 59° 29' E, 100.00 ft. distant, to Corner No. 3; thence S 30° 31' W, 1301.10 ft. distant to Corner No. 4; thence West 116.26 ft. distant, to Corner No. 1, the place of beginning.

An undivided one-half interest in and to the Pipe Line Easement from the United States Government to the Defendant, as follows:

C. Pipe line easement from United States Government to Defendant:

Being a water pipe line easement across the Northeast Quarter of the Northwest Quarter (NE $\frac{1}{4}$ NW $\frac{1}{4}$) and the Northwest Quarter of the Northeast Quarter (NW $\frac{1}{4}$ NE $\frac{1}{4}$) of Section Thirty-one (31), Township Forty-nine (49) North, Range Three (3) East of the Boise Meridian. This easement is for a twenty-foot width, lying ten feet on either side of the center line which is more particularly described as follows:

Beginning at a point from whence the Quarter Section Corner between Sections Thirty (30) and Thirty-one (31), T 49 N, R 3 E., B. M. bears West 43.55 ft. distant; thence S 34° 30' 50" W, 64.29 ft. to a point; thence S 18° 48' W, 426.65 ft. to a point; thence S 11° 31' 20" W, 257.54 ft. to a point; thence S 16° 35' 30" W, 322.31 ft. to a point; thence S 15° 41' 40" W, 308.94 ft. to a point.

An undivided one-half interest in and to the pipe line situated on Defendant's property, as follows:

D. Pipe line situated on Defendant's property.

A water pipe line across the Southeast Quarter of the Northwest Quarter (SE $\frac{1}{4}$ NW $\frac{1}{4}$) and the Northeast Quarter of the Southwest Quarter (NE $\frac{1}{4}$ SW $\frac{1}{4}$), all in Section Thirty-one (31), Township Forty-nine (49) North, Range Three (3) East of the Boise Meridian, the center line of which is more particularly described as follows: Beginning at a point from which the North Quarter Section Corner of Sec. 31, T 49 N, R 3 E., B. M. bears N 15° 12' E, 1363.22 ft. distant; thence S 15° 41' 40" W, 173.81 ft. distant to a point; thence S 26° 30' 10" W, 291.62 ft. distant to a point; thence S. 21° 08' 30" W, 101.89 ft. distant to a point; thence S 10° 33' 50" W, 111.49 ft. distant to a point; thence S 15° 32' W, 290 ft. distant to a point; thence S 20° 08' W, 360 ft. distant to a point identified as a fire hydrant located on the 8-inch water pipe line.

E. An undivided one-half interest in and to the pipe line facilities over and across the property hereinbefore described;

F. An easement over and across the following described property belonging to Defendant from the South end of Defendant's pipe line to the property herein condemned by Plaintiff, said easement more particularly described as follows, to-wit:

Being an easement for a water pipe line across a portion of the Northeast Quarter of the Southwest Quarter (NE $\frac{1}{4}$ SW $\frac{1}{4}$) of Section Thirty-one (31), Township Forty-nine (49) North, Range Three (3) East of the Boise Meridian, 10 feet wide and lying five feet on either side of a center line, which is more particularly described as follows:

Beginning at a point identical with a fire hydrant located on the 8-inch water line, from whence the North Quarter Section Corner of said Sec. 31 bears N 16° 58' E, 2765.50 ft. distant; thence S 20° 03' W, 1220 ft. distant to a point; thence S 58° 20' E, 100 ft. to a point,

is hereby taken and condemned for the use and purpose described and set forth in Plaintiff's Amended Complaint, as amended, that is to say, to and for the use of Plaintiff West Shoshone Hospital District No. 1, a municipal corporation of the State of Idaho, for a permanent public general hospital building and facilities necessary for and in the operation of the duties imposed upon said District by the laws of the State of Idaho, and to enable Plaintiff to construct and maintain such general hospital facilities for the use of all the people within the boundaries of said West Shoshone Hospital District No. 1.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED, That said use is a public use and a use authorized by law.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED, That a copy of this Order and Judgment be filed in the Office of the Recorder of the County of Shoshone, State of Idaho, and thereupon the property hereinbefore described and the title thereto shall vest in the Plaintiff in fee simple absolute.

IT IS FURTHER ORDERED, That Plaintiff pay the costs and fees of the Commissioners appointed by this Court to appraise the damages in the amount of Fifty and no/100 (\$50.00) Dollars for each of such Commissioners, and that neither party be awarded costs of suit in this proceeding.

DONE IN OPEN COURT, At Wallace, Idaho, this 10th day of September, 1956.

s/ Albert J. Graf
District Judge

WEST SHOSHONE HOSPITAL DISTRICT
No. 1, a municipal corporation of
the State of Idaho,
Plaintiff

୪୨.

STATE OF IDAHO,) ss.
County of Shoshone,)

IN WITNESS WHEREOF, I hereunto set my hand and affix the seal of said Court this 10th day of September, A.D., 1956.

ANNA K. BATTICK
Clerk of the District Court.
By Merle Myers
Deputy Clerk.

ANNA K. BATTICK, COUNTY RECORDER
By Shirley M. Hildes Deputy

36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100 101 102 103 104 105 106 107 108 109 110 111 112 113 114 115 116 117 118 119 120 121 122 123 124 125 126 127 128 129 130 131 132 133 134 135 136 137 138 139 140 141 142 143 144 145 146 147 148 149 150 151 152 153 154 155 156 157 158 159 160 161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181 182 183 184 185 186 187 188 189 190 191 192 193 194 195 196 197 198 199 200 201 202 203 204 205 206 207 208 209 210 211 212 213 214 215 216 217 218 219 220 221 222 223 224 225 226 227 228 229 230 231 232 233 234 235 236 237 238 239 240 241 242 243 244 245 246 247 248 249 250 251 252 253 254 255 256 257 258 259 260 261 262 263 264 265 266 267 268 269 270 271 272 273 274 275 276 277 278 279 280 281 282 283 284 285 286 287 288 289 290 291 292 293 294 295 296 297 298 299 300 301 302 303 304 305 306 307 308 309 310 311 312 313 314 315 316 317 318 319 320 321 322 323 324 325 326 327 328 329 330 331 332 333 334 335 336 337 338 339 340 341 342 343 344 345 346 347 348 349 350 351 352 353 354 355 356 357 358 359 360 361 362 363 364 365 366 367 368 369 370 371 372 373 374 375 376 377 378 379 380 381 382 383 384 385 386 387 388 389 390 391 392 393 394 395 396 397 398 399 400 401 402 403 404 405 406 407 408 409 410 411 412 413 414 415 416 417 418 419 420 421 422 423 424 425 426 427 428 429 430 431 432 433 434 435 436 437 438 439 440 441 442 443 444 445 446 447 448 449 450 451 452 453 454 455 456 457 458 459 460 461 462 463 464 465 466 467 468 469 470 471 472 473 474 475 476 477 478 479 480 481 482 483 484 485 486 487 488 489 490 491 492 493 494 495 496 497 498 499 500 501 502 503 504 505 506 507 508 509 510 511 512 513 514 515 516 517 518 519 520 521 522 523 524 525 526 527 528 529 530 531 532 533 534 535 536 537 538 539 540 541 542 543 544 545 546 547 548 549 550 551 552 553 554 555 556 557 558 559 560 561 562 563 564 565 566 567 568 569 570 571 572 573 574 575 576 577 578 579 580 581 582 583 584 585 586 587 588 589 590 591 592 593 594 595 596 597 598 599 600 601 602 603 604 605 606 607 608 609 610 611 612 613 614 615 616 617 618 619 620 621 622 623 624 625 626 627 628 629 630 631 632 633 634 635 636 637 638 639 640 641 642 643 644 645 646 647 648 649 650 651 652 653 654 655 656 657 658 659 660 661 662 663 664 665 666 667 668 669 670 671 672 673 674 675 676 677 678 679 680 681 682 683 684 685 686 687 688 689 690 691 692 693 694 695 696 697 698 699 700 701 702 703 704 705 706 707 708 709 710 711 712 713 714 715 716 717 718 719 720 721 722 723 724 725 726 727 728 729 730 731 732 733 734 735 736 737 738 739 740 741 742 743 744 745 746 747 748 749 750 751 752 753 754 755 756 757 758 759 760 761 762 763 764 765 766 767 768 769 770 771 772 773 774 775 776 777 778 779 780 781 782 783 784 785 786 787 788 789 790 791 792 793 794 795 796 797 798 799 800 801 802 803 804 805 806 807 808 809 810 811 812 813 814 815 816 817 818 819 820 821 822 823 824 825 826 827 828 829 830 831 832 833 834 835 836 837 838 839 840 841 842 843 844 845 846 847 848 849 850 851 852 853 854 855 856 857 858 859 860 861 862 863 864 865 866 867 868 869 870 871 872 873 874 875 876 877 878 879 880 881 882 883 884 885 886 887 888 889 890 891 892 893 894 895 896 897 898 899 900 901 902 903 904 905 906 907 908 909 910 911 912 913 914 915 916 917 918 919 920 921 922 923 924 925 926 927 928 929 930 931 932 933 934 935 936 937 938 939 940 941 942 943 944 945 946 947 948 949 950 951 952 953 954 955 956 957 958 959 960 961 962 963 964 965 966 967 968 969 970 971 972 973 974 975 976 977 978 979 980 981 982 983 984 985 986 987 988 989 990 991 992 993 994 995 996 997 998 999 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011 1012 1013 1014 1015 1016 1017 1018 1019 1020 1021 1022 1023 1024 1025 1026 1027 1028 1029 1030 1031 1032 1033 1034 1035 1036 1037 1038 1039 1040 1041 1042 1043 1044 1045 1046 1047 1048 1049 1050 1051 1052 1053 1054 1055 1056 1057 1058 1059