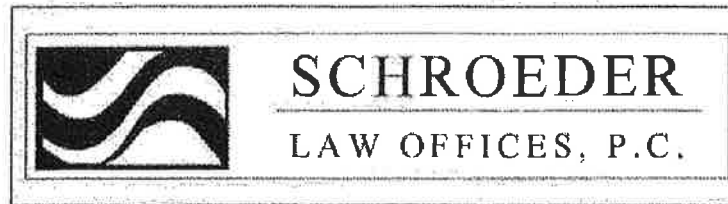


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Of Counsel
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James Browitt
Of Counsel
Idaho & Washington

September 19, 2018

VIA U.S. MAIL AND FACSIMILE

Idaho Department of Water Resources
Eastern Regional Office
900 North Skyline Drive, Suite A
Idaho Falls, ID 83402-1718
Facsimile: (208) 525-7177

Idaho Department of Water Resources
State Office
322 East Front Street
Boise, ID 83702-0098
Facsimile: (208) 287-6700

**RE: Matter of Transfer Application 81155: Motion for Scheduling Order:
Discovery**

To Whom It May Concern:

Enclosed please find Spartan Portneuf, LLC's *Motion for Scheduling Order: Discovery*
and *[Proposed] Order: Discovery* for filing in the above-referenced matter.

If you have any questions, please contact our office at (503) 281-4100. Thank you in
advance for your cooperation and assistance.

Very truly yours,
SCHROEDER LAW OFFICES, P.C.

Rachel S. Harman
Paralegal

RSH:rsh

Enclosures

cc: Service List
Client

1915 NE Cesar E. Chavez Boulevard, Portland, Oregon 97212 (503) 281-4100

10615 Double R Boulevard, Suite 100, Reno, Nevada 89521 (775) 786-8800

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4 PHONE -- (503) 281-4100 FAX -- (877) 600-4971
counsel@water-law.com

5 Attorneys for Protestant

6
7 **BEFORE THE DEPARTMENT OF WATER RESOURCES**
8 **OF THE STATE OF IDAHO**

9
10 IN THE MATTER OF APPLICATION
FOR TRANSFER NO. 81155 IN THE
11 NAME OF CITY OF POCA TELLO

MOTION FOR SCHEDULING ORDER:
DISCOVERY

12
13 **MOTION**

14 Protestant Spartan Portneuf, LLC ("Spartan Portneuf"), by and through Schroeder Law
15 Offices, P.C., and its attorneys, hereby moves the Idaho Department of Water Resources
16 ("Department") for an Order scheduling the deadlines and procedure for discovery in the above-
17 captioned matter.

18 Spartan Portneuf specifically moves the Department to order the following:

- 19 1. General discovery to commence on September 20, 2018.
- 20 2. Written discovery may be interrogatories and/or requests for production. Parties shall
21 not propound more than twenty-five (25) interrogatories on another party.
22 Interrogatories shall not be divided into sub-parts or sub-questions. Discovery
23 requests shall be served on or before October 22, 2018.

24 ///

25 ///

26 ///



1 3. Answers to written discovery must be served on the requesting party within thirty
2 (30) days of service of the request. All responses to discovery shall be served on or
3 before November 21, 2018.

4 DATED this 19th day of September, 2018.

5 SCHROEDER LAW OFFICES, P.C.

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Laura A. Schroeder
James Browitt

Attorneys for Protestant



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of September, 2018, I caused a true and correct copy of the *MOTION FOR SCHEDULING ORDER: DISCOVERY* to be delivered to the following by U.S. Mail and Facsimile.

Idaho Department of Water Resources
Eastern Regional Office
900 North Skyline Drive, Suite A
Idaho Falls, ID 83402-1718
Facsimile: (208) 525-7177

Idaho Department of Water Resources
State Office
322 East Front Street
Boise, ID 83702-0098
Facsimile: (208) 287-6700

I HEREBY CERTIFY that on this 19th day of September, 2018, I caused a true and correct copy of the *MOTION FOR SCHEDULING ORDER: DISCOVERY* to be delivered to the following by U.S. Mail and Electronic Mail.

Kirk Bybee
City of Pocatello
P.O. Box 4169
Pocatello, ID 83201
Email: kibybee@pocatello.us

Sarah A. Klahn
Somach Simmons & Dunn
2701 Lawrence Street, Suite 113
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FAX – (877) 600-4971
counsel@water-law.com



FAX COVER SHEET

TO	Eastern Regional Office
COMPANY	Idaho Department of Water Resources
FAX NUMBER	12085257177
FROM	Schroeder Law Offices
DATE	2018-09-19 17:49:35 GMT
RE	Matter of Transfer Application 81155: Motion for Scheduling Order: Discovery

COVER MESSAGE

To Whom It May Concern:

Attached please find a letter from our office enclosing two documents for filing in the above-referenced matter. Please contact us at (503) 281-4100 if there are any issues with the transmission or content of the attachment.

Regards,

RachelqHarman

Schroeder Law Offices, P.C.

r.harman@water-law.com

(503) 281-4100