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FEB 23 2015
Department of Water Resources
Eastern Region

*Attorneys for Thomas Leno, Cedar Ridge Dairy, LLC,
and Four Sisters Dairy, LLC*

**BEFORE THE DEPARTMENT OF WATER RESOURCES
OF THE STATE OF IDAHO**

IN THE MATTER OF APPLICATION FOR
TRANSFER NOS. 79357, 79380, & 79384
(in the name of Thomas & Dorothy Leno);
79466 (in the name of Four Sisters Dairy,
LLC)

**NOTICE OF TAKING DEPOSITION
DUCES TECUM OF MARGARET
WINSRYG**

**THURSDAY FEBRUARY 26, 2015
9:00 a.m.**

**Coleman, Ritchie & Cluff
156 2nd Ave. West
Twin Falls, Idaho 83303-0525**

TO: MARGARET WINSRYG AND HER ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that the Applicants will take the deposition of Margaret Winsryg before a certified Court Reporter, in accordance with the Idaho Rules of Civil Procedure, on Thursday, the 26th of February, 2015, at the hour of 9:00 a.m. at the offices of Coleman, Ritchie & Cluff, 156 2nd Ave. West, Twin Falls, Idaho 83303-0525.

The Deponent is further required to identify and bring with her the following documents:

1. Copies of your file, including but not limited to, memos, notes, drawings, sketches, maps, spreadsheets, and drafts thereof, related to the above-referenced applications for transfer and your protests that were filed.
2. Copies of all documents that reflect communications with other Protestants in this matter concerning the above-referenced applications for transfer, your protest, and any other issue that pertains to these contested cases.
3. Copies of all documents that reflect communications with anyone with the Idaho Department of Water Resources concerning the above-referenced applications for transfer, your protest, and any other issue that pertains to these contested cases.
4. Copies of all documents that reflect communications with the Idaho State Department of Agriculture concerning the dairies identified as the places of use in above-referenced applications for transfer and these contested cases.
5. Copies of all documents that reflect communications with any other state agency or local government concerning the dairies identified as the places of use in above-referenced applications for transfer and these contested cases.
6. Copies of all documents related to the any and all opinions to be expressed by you in these contested cases, the basis and reasons therefore, and the data or other information considered by you in forming the opinions.
7. Copies of all exhibits to be used by you in the hearings in these contested cases.
8. Copies of all documents pertaining to your domestic well.
9. Copies of all documents that reflect communications with Ed Squires, DuWayne Kimball, and Bill Bonnichsen, including agreements to retain such individuals as

expert witnesses in these contested cases and the compensation to be paid to such witnesses.

10. Copies of all documents that pertain to or were relied upon by you in preparing your *Answers to Applicants' First Discovery Requests to Protestant Margaret Winsryg and Leroy Elliott* (dated December 22, 2014).
11. Copies of all documents obtained or discovered since December 22, 2014 that would supplement or amend your *Answers to Applicants' First Discovery Requests to Protestant Margaret Winsryg and Leroy Elliott* (dated December 22, 2014).

The term "document" as used above includes, but is not limited to, notes (oral or written), memoranda, reports, studies, maps, surveys, plans, drawings, photographs, calculations, spreadsheets and any computer analyses, whether written or electronic in format.

The oral examination will continue from day to day until completed.

DATED this 15th day of February, 2015.

BARKER ROSHOLT & SIMPSON LLP



Travis L. Thompson

Attorneys for Thomas Leno, Cedar Ridge Dairy, LLC, and Four Sisters Dairy, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of February, 2015, I served a true and correct copy of the foregoing *Notice of Taking Deposition Duces Tecum of Margaret Winsryg* by depositing same in the United States mail, postage prepaid, addressed to the following:

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