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Department of Water Resources
Eastern Region

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*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 ED SQUIRES**

**FRIDAY MARCH 13, 2015
8:30 a.m.**

**1010 W. Jefferson St., Suite 102
Boise, Idaho 83701**

**TO: ED SMITH
P.O. Box 6015
Twin Falls, Idaho 83301**

**ED SQUIRES
1002 W. Franklin St.
Boise, Idaho 83702**

PLEASE TAKE NOTICE that the Applicants will take the deposition of Ed Squires before a certified Court Reporter, in accordance with the Idaho Rules of Civil Procedure, on Friday, the 13th of March, 2015, at the hour of 8:30 a.m. at the offices of Barker Rosholt & Simpson LLP, 1010 W. Jefferson St., Suite 102, Boise, Idaho 83701.

The Deponent is further required to identify and bring with him 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 any reports that you filed in these cases.
2. Copies of all documents that reflect communications with any Protestants in this matter concerning the above-referenced applications for transfer 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 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 that reflect communications with any other person concerning the above-referenced applications for transfer and any other issue that pertains to these contested cases.
7. Copies of all documents related to the any and all testimony and/or 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 testimony and/or opinions.

8. Copies of all exhibits to be used by you in the hearings in these contested cases.
9. Copies of all documents that reflect communications with DuWayne Kimball, Jr. and Bill Bonnichsen concerning any matter in these contested cases.
10. Copies of all documents and agreements with the Protestants to retain you as an expert witness in these contested cases, including any documents or agreements that identify the compensation to be paid to you.
11. Copies of all documents that pertain to or were relied upon by you in preparing your report filed in these contested cases (dated February 13, 2015).
12. Copies of all documents that pertain to or were relied upon by you in preparing any rebuttal reports to be filed by you in these proceedings.
13. All documents you have reviewed or will review in preparation for this deposition.

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 3rd day of March, 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 3rd day of March, 2015, I served a true and correct copy of the foregoing *Notice of Taking Deposition Duces Tecum of Ed Squires* by depositing same in the United States mail, postage prepaid, addressed to the following:

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